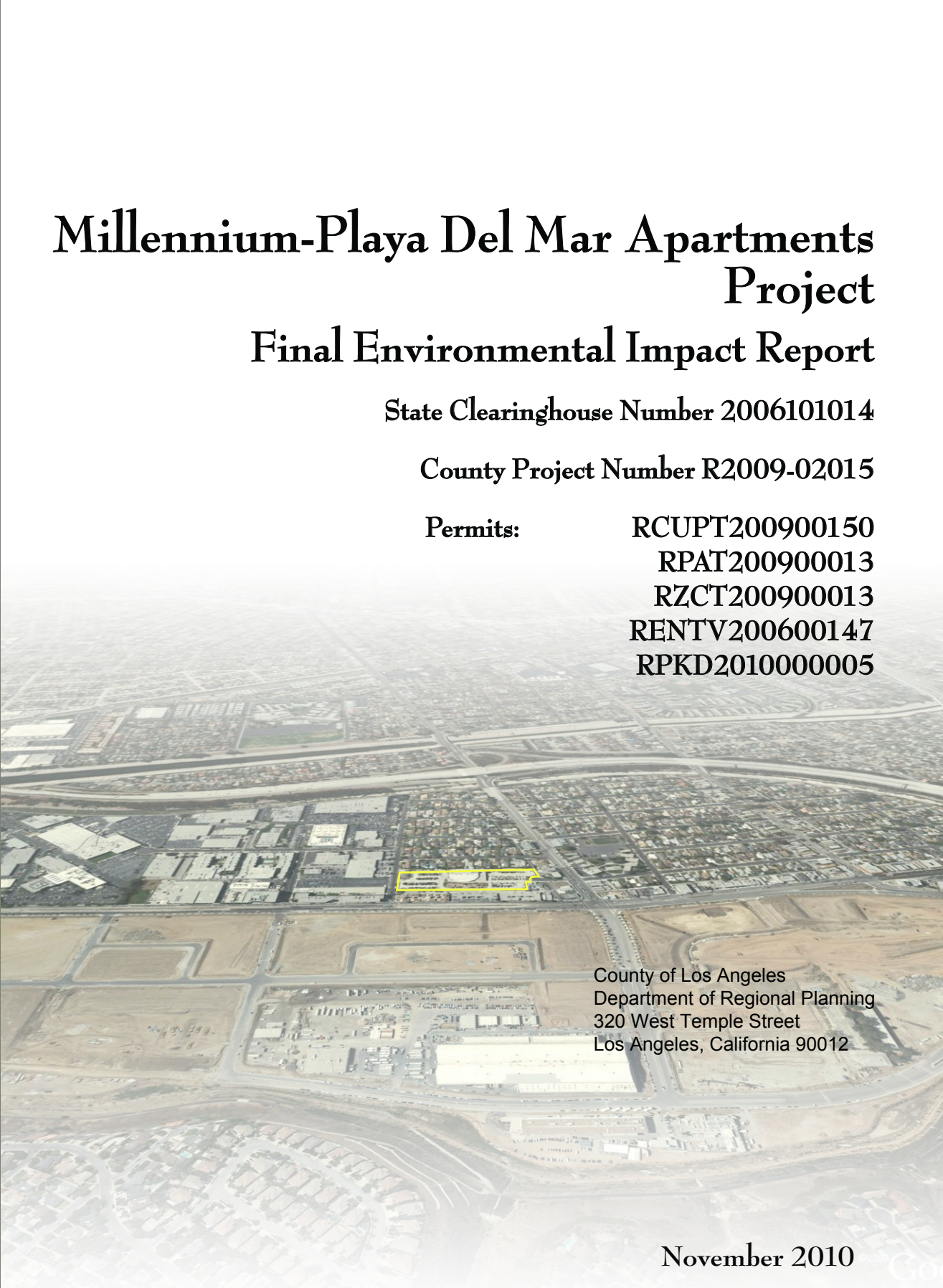


Millennium-Playa Del Mar Apartments Project Final Environmental Impact Report

State Clearinghouse Number 2006101014

County Project Number R2009-02015

Permits: RCUPT200900150
 RPAT200900013
 RZCT200900013
 RENTV200600147
 RPKD2010000005



County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

November 2010

Final Environmental Impact Report
MILLENNIUM-PLAYA DEL MAR
APARTMENTS PROJECT

State Clearinghouse No. 2006101014

COUNTY PROJECT NO. R2009-02015
GENERAL PLAN AMENDMENT CASE NO.
RPAT200900013

CONDITIONAL USE PERMIT NO.
RCUPT200900150

PARKING DEVIATION RPKDT2010000005
ZONE CHANGE NO. RZCT200900013
ENVIRONMENTAL CASE NO. RENTV200600147

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1.0 INTRODUCTION TO THE FINAL EIR

1.1 PURPOSE

This document represents the Final Environmental Impact Report for the Millennium-Play del Mar Apartments project (County of Los Angeles Project No. R2009-002015). It has been prepared in accordance with Section 15132 of the *California Environmental Quality Act (CEQA) Guidelines*, as amended. As required by this section, a Final EIR shall consist of the following:

- The Draft EIR or a revision of the Draft EIR.
- Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Other information deemed necessary by the Lead Agency.

The evaluation and response to public comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

1.2 PROCESS

As defined by Section 15050 of the *State CEQA Guidelines*, the County of Los Angeles is serving as “Lead Agency,” responsible for preparing both the Draft and Final EIR for this project. A Notice of Preparation (NOP) was prepared and circulated by the County of Los Angeles December 10, 2009, through January 18, 2010, for the required 30-day review period.

The County of Los Angeles Department of Regional Planning (DRP) circulated the Draft EIR and related appendices to affected agencies, the public and other interested persons on March 18, 2010. This 60-day public comment period on the original Draft EIR closed on May 17, 2010. Three sections of the Draft EIR (project description, traffic and access, and visual resources) were revised and recirculated for public review on August 19, 2010. This 45-day comment period on the Recirculated Draft EIR closed on October 6, 2010.

The Regional Planning Commission held an initial hearing on May 12, 2010, without testimony as the applicant requested a continuance. A second public hearing was held June 16, 2010, also without testimony at the request of the applicant for continuation of discussion with community representatives on the project design in regard to density, height, access and parking. A third hearing was held July 14, 2010, at which the applicant presented a revised project design and testimony was heard on the proposed project discretionary requests. A fourth hearing was held on October 6, 2010, to hear comments on the revised project design and to receive responses from the applicant to issues and concerns raised by the Commission and members of the public at the July 12, 2010 hearing. A fifth hearing was held November 10, 2010.

A total of 43 comment letters were received in response to the first public Draft EIR. A total of five comment letters were received in response to the Recirculated Draft EIR. A list of commenters is shown below. The comment letters have been numbered and organized chronologically into the following categories: Public Agencies and Other Commenters.

The bracketed original comment letters are provided, followed by numbered responses to each bracketed comment. Individual comments within each letter are numbered and the response is given a matching number. Where responses result in a change to the text of the Draft EIR, it is noted within the response to the comment. Any attachments accompanying the original comment letters are provided in **Appendix 3.0**, of this Final EIR.

1.3 CONTENTS OF THE FINAL EIR

As discussed above, the primary intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained within the Draft EIR. Pursuant to Section 15088 of the *State CEQA Guidelines*, the County of Los Angeles, as the Lead Agency for this project, has reviewed and addressed all comments received on the Draft EIR prepared for The Millennium-Playa del Mar Apartments project. Included within the Final EIR are written comments that were submitted during the required public review period and extensions approved by the Los Angeles County Regional Planning Commission. Responses to oral testimony received at the Regional Planning Commission hearings of July 14, 2010, and October 6, 2010, are addressed in **Section 3.3, Topical Responses**.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final EIR has been prepared in four parts. A description of each part is as follows:

- Part 1 provides a brief introduction to the Final EIR and its contents.
- Part 2 provides corrections to the Project Description section of the Recirculated Draft EIR.

- Part 3 provides responses to written comments made by both the public agencies and interested parties. Included are each written comment received by County of Los Angeles Department of Regional Planning staff during the required public review period and extensions for both the March 2010 Draft EIR and the August 2010 Recirculated Draft EIR approved by the Los Angeles County Regional Planning Commission. Following each letter, responses are provided. Before the responses, this Final EIR includes an “Introduction to Response to Comments/Written Responses.”

Consistent with state law (Public Resources Code 21092.5), responses to agency comments were forwarded to each commenting agency at least 10 days prior to the last public hearing. The Final EIR is available for public review at the:

County of Los Angeles Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012
Contact: Anthony Curzi

City of Los Angeles
Westchester-Loyola Library
7114 West Manchester Avenue
Los Angeles, California 90045-3509

City of Los Angeles
Mar Vista Library
12006 Venice Boulevard
Los Angeles, California 90066-3810

City of Los Angeles
Playa Vista Library
6400 Playa Vista Drive
Playa Vista, California 90094-2168

County of Los Angeles
Culver City Julian Dixon Library
4975 Overland Avenue
Culver City, California 90230

2.0 REVISIONS TO DRAFT EIR AND RECIRCULATED DRAFT EIR

2.1 REVISIONS TO PROJECT DESCRIPTION

Revisions have been made to the text of the March 2010 Draft EIR and the August 2010 Recirculated Draft EIR as a result of project design features made by the project proponent in response to concerns raised by the community.

Text added to the Draft EIR or the Recirculated Draft EIR is shown in underline format, and deleted text is shown in strikethrough. This section, in combination with the Draft EIR, the Recirculated Draft EIR, and the responses to comments section herein constitutes the Final EIR. This presentation of revisions to the Draft EIR is consistent with *California Environmental Quality Act (CEQA) Guidelines* Section 15132 detailing required Final EIR contents.

Section 3.0 Project Description

The following section and table within Section 3.0 Project Description of the Recirculated Draft EIR have been revised:

3.4 PROJECT CHARACTERISTICS

3.4.1 Overview of Site Plan

The proposed project is a request to develop the site with 196 apartments in one primary building with a maximum height of four stories (49 feet; 51 feet at the stairwell towers) and three two-story buildings (22 feet) at the northwest property boundary. The proposed project includes a 329-space parking structure with a maximum height of four stories (approximately 35 feet) in addition to 20 private garages along the northwest property boundary. The existing church, parking lot, and single-family residence will be removed. Egress only will be provided by an existing alley south of the project site, and ingress and egress will be provided by a new private driveway and fire lane along the northern part of the site.

The project consists of one, primary, maximum four-story apartment building and ~~five-six~~ one-bedroom, carriage units in three structures, collectively containing a total of 196 apartment units. The apartment building is designed to be organized on three sides (to the north, east and west) around a four-story-deck (approximately 35-feet high) aboveground parking structure and incorporates open courtyard areas. Emphasis has been placed on a building design that provides a graduated-height transition along the northern and southern site perimeters. Building height is limited to two stories (28 feet) along the northerly edge of the structure (in proximity to the single-family residences located northerly of the site), and increases to a maximum of four stories (approximately 49 feet) as the building transitions from north to south across the site toward the existing apartment complex that is sited adjacent to the subject property to the south. The four-story portion of the apartment building are along the western and eastern perimeters and adjacent to the parking structure. **Figure 3.0-2** shows the proposed site plan for the project. **Figures 3.0-3** through **3.0-4** provide architectural elevations for the proposed project. A total of 353 parking spaces (329 spaces in a parking garage, 20 parking spaces in private garages, and 4 on-grade parking spaces opposite the leasing office) would be provided as a part of the proposed project. The 329-space parking garage would have a maximum height of 35 feet and is proposed to be mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The number of parking spaces is not consistent with current County Code requirements (a total of 394 spaces are required by County Code for apartments) and a parking deviation for less than the required parking is being requested by the project applicant as a part of the project approval. The project would also include four courtyards, an outdoor pool in courtyard one, a leasing office, a fitness center, and rest rooms. The existing (25-foot-wide) alleyway that occurs along the southern perimeter of the site would be widened to 28 feet. All interior spaces would be air-conditioned.

3.4.2 Proposed Building Layout

The proposed buildings would provide 196 apartment units. Three two-story structures would be located on the northwestern portion of the project site. These buildings would be designed as one-bedroom “carriage units” with parking on the ground level and apartment units on the second floor. ~~Five-Six~~ residential units would be contained in the three two-story structures, with 20 parking spaces to be provided below. The primary residential building, ranging from two to four stories, would contain an entrance lobby, courtyards, elevator bays, stairwells, and vehicular and pedestrian access to the garage. Floor plans for each of the four residential levels of the project are illustrated on **Figures 3.0-5 to 3.0-8**. Total interior square footage of the building, exclusive of courtyard and parking areas, is approximately 261,447 square feet.

3.4.2.1 Apartment Units

There are ~~eight-10~~ unit types (floor plans) proposed for the project, ranging in size from a 724-square-foot one-bedroom unit to a ~~1,137-1,450~~-square-foot ~~two-three~~-bedroom unit. Average unit size would be approximately ~~898-925~~ square feet with a majority having attached balconies or patios (not included in square footage calculations). The proposed project would consist of ~~95-100~~ one-bedroom units (including the six carriage units) and ~~101-94~~ two-bedroom units, and two three-bedroom units. **Table 3.0-1** presents the number of each size of unit that would be constructed in the building.

Table 3.0-1
Proposed Unit Types

Unit Type	Unit Size in square feet	Total Units
1 bedroom/1 bath (A1)	724	61 <u>57</u>
1 bedroom/1 bath (A2)	729	37 <u>34</u>
1 bedroom/1 bath (A3)	747	<u>23</u>
Carriage (<u>A4</u>)	791	<u>56</u>
2 bedroom/2 bath (B1)	1,067	29
2 bedroom/2 bath (B2)	1,093 <u>1,097</u>	20 <u>14</u>
2 bedroom/2 bath (B5)	1,067 <u>1,062</u>	16 <u>15</u>
2 bedroom/2 bath (B4)	1,137 <u>1,163</u>	26 <u>20</u>
<u>2 bedroom/2.5 bath townhouse (TH)</u>	1,242	<u>16</u>
<u>3 bedroom/ 3 bath(C1)</u>	1,450	<u>2</u>
TOTAL	898-925 average	196

Source: Architects Orange, 2010

Section 4.1 Land Use and Planning

The following section and figure within Section 4.1 Land Use and Planning of the Draft EIR has been revised:

4.1.4.4.1 Consistency with County of Los Angeles General Plan

4.1.4.4.1.1 Land Use Designations

In addition, while the density of the proposed project could be considered a sensitive land use interface issue in this case with single-family residences to the north, the proposed project is consistent with higher-density residential uses situated to the south. Moreover, in consideration of the sensitive single-family residential uses to the north, and in order to ensure the project's physical compatibility with these residences, proposed building height is limited to ~~one and~~ two stories along the northerly edge of the structure (in proximity to the single-family residences located northerly of the site), and increases to three stories at the northwest corner, and to a maximum of four stories as the building transitions from north to south across the site toward the existing apartment complex that is sited adjacent to the subject property to the southeast. However, only three story units are proposed along the southern alley. **Figure 4.1-2, Surrounding Residential Density**, illustrates the transition in density from Jefferson Boulevard northward. This design provides a height transition from the one-story single-family homes and private back yards along the northern perimeter to the mid-rise multi-family apartments on the southern boundary. In order to further ensure the project's physical compatibility with the single-family residences to the north, the project is designed with an ~~open space~~ acoustical attenuation buffer along the ~~northerly~~ northwesterly side of the building. Along the northern boundary, the building would be set back a minimum of approximately 35 feet and a maximum of about ~~43-60~~ feet from the northern site boundary; two-story perimeter structures would not exceed ~~34-28~~ feet in exterior height (excluding chimney heights) along the northern project margin. At the northwest corner of the project site, a three-story portion of the building would reach a height of ~~40-38.5~~ feet. At approximately 80 feet from the northern property line, the building would transition to a height of four stories, or about ~~53-54~~ feet, exclusive of architectural projections at the roofline. The height of the parking structure would be ~~56-35~~ feet.

Section 4.5 Traffic and Access

The following section and figure within Section 4.5 Traffic and Access of the Recirculated Draft EIR have been revised:

4.5.4.3.7 Future Year 2013 Base Conditions Plus Project Traffic Volumes

- 4.5-1** A traffic signal including the provision of an Automated Traffic Surveillance and Control (ATSAC) System and Adaptive Traffic Control System (ATCS) shall be installed at the intersection of Grosvenor Boulevard/Jefferson Boulevard, prior to the issuance of a certificate of occupancy. ~~The project shall make a deposit of \$200,000.00 to the City of Los Angeles shall be solely responsible for the design and construction of the new traffic signal at this intersection. for for the installation of the traffic signal given provisions defined by the County of Los Angeles Department of Public Works (the Traffic Study in Appendix 4.5)~~ The design and construction phases shall be processed through a B-permit issued by the City of Los Angeles' Department of Public Works, Bureau of Engineering.

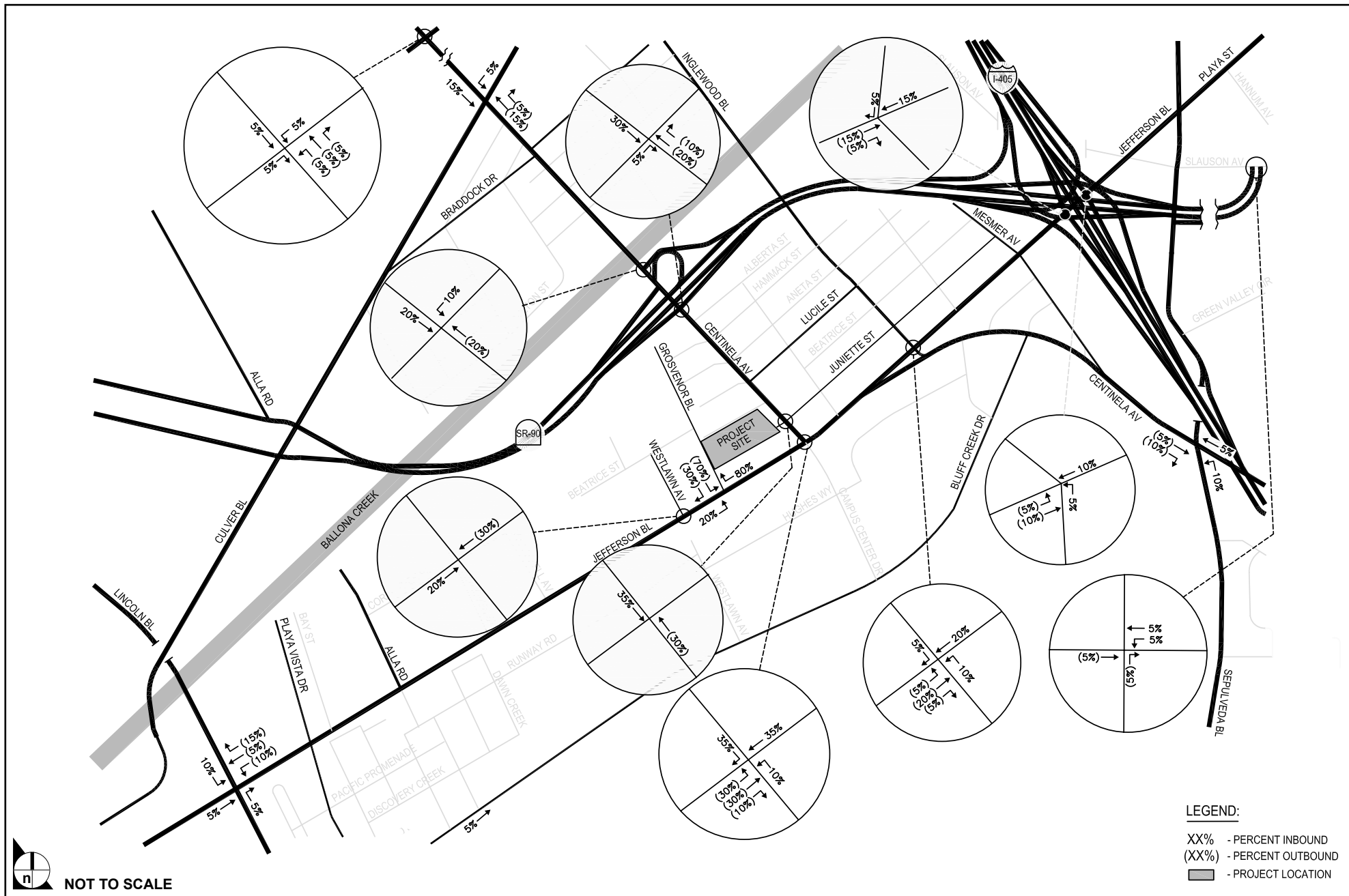


FIGURE 4.5-4

Project Trip Distribution

3.0 RESPONSES TO WRITTEN COMMENTS ON THE DRAFT EIR

3.1 LIST OF PUBLIC AGENCIES AND PRIVATE PARTIES COMMENTING ON THE ORIGINAL PUBLIC DRAFT EIR

Public Agencies

1. County of Los Angeles Department of Public Works Road Maintenance District 3, e-mail dated March 29, 2010
2. County of Los Angeles Public Library, letter dated April 13, 2010
3. City of Culver City Public Works Department, letter dated April 22, 2010
4. City of Los Angeles Councilmember Bill Rosendahl, letter dated April 27, 2010
5. State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit, letter dated May 4, 2010
6. Metropolitan Transportation Authority, letter dated May 4, 2010

Local Organizations and Individuals

7. Leonard and Valerie Brownrigg, e-mail dated March 19, 2010
8. Form Letter signed by Dennis Kitaguana and Hsei-Hsiang Chen, letter dated April 7, 2010
9. Form Letter signed by Nobuo Sugiyama, letter dated April 7, 2010
10. Form Letter signed by Shonori Sugiyama, letter dated April 7, 2010
11. Form Letter signed by Teresa and Thomas Ball, letter dated April 7, 2010
12. Form Letter signed by Lisa Lee, letter dated April 7, 2010
13. Form Letter signed by Tomeko Sugiyama, letter dated April 7, 2010
14. Form Letter signed by Nobuo Sugiyana, letter dated April 7, 2010
15. Form Letter signed by Megumi Sugiyana, letter dated April 7, 2010
16. Form Letter signed by Jennifer and Mark Oki, letter dated April 7, 2010
17. Form Letter signed by Kim Shockley, letter dated April 7, 2010
18. Form Letter signed by Mary L. Shockley, letter dated April 7, 2010

19. Form Letter signed by Marcel Raquel Beltran, letter dated April 7, 2010
20. Form Letter signed by Illegible Signature, letter dated April 7, 2010
21. Form Letter signed by Glenn La Fernan, letter dated April 7, 2010
22. Form Letter signed by Ed Stewart, letter dated April 7, 2010
23. Form Letter signed by Karen Tokubo, letter dated April 7, 2010
24. Form Letter signed by Sam Fujinami, letter dated April 7, 2010
25. Form Letter signed by Sal Gamboa, letter dated April 7, 2010
26. Form Letter signed by Shawn Veginaw, letter dated April 7, 2010
27. Form Letter signed by Illegible Signature, letter dated April 7, 2010
28. Form Letter signed by Michael D. Shockley, letter dated April 7, 2010
29. Form Letter signed by Carolyn and Betty Goldsmith, letter dated April 7, 2010
30. Form Letter signed by Yoshimi Shigekan, letter dated April 7, 2010
31. Form Letter signed by Timothy and Patricia Carvel, letter dated April 7, 2010
32. Form Letter signed by Melissa Kurtz, letter dated April 7, 2010
33. Form Letter signed by Kelly and Ronald Zullo, letter dated April 7, 2010
34. Form Letter signed by Brian Reed, letter dated April 7, 2010
35. Form Letter signed by Illegible Signature, letter dated April 7, 2010
36. Matthew Murray, letter dated April 21, 2010
37. Susan and David Boyer as well as Alan and Debby Berg, letter undated (references Wayne Avrashow letter)
38. Wayne Avrashow, letter dated April 28, 2010
39. Elizabeth Zamora, letter dated April 28, 2010
40. Susan Boyer, e-mail dated April 30, 2010
41. Elizabeth Zamora, letter dated May 9, 2010
42. Mickey Shockley, letter dated May 9, 2010
43. Wayne Avrashow, letter May 17, 2010

43A. Menlo Scientific Acoustics, Inc. letter to Wayne Avrashow, dated May 17, 2010

43B. L.A. Private Eyes Geotechnical Engineers letter to Wayne Avrashow, dated May 7, 2010

43C. Overland Traffic Consultants, Inc. letter to Wayne Avrashow, dated May 17, 2010

44. Carole Suzuki, letter dated July 8, 2010

45. Petition Signed by Local Residents

**3.2 LIST OF PUBLIC AGENCIES AND PRIVATE PARTIES COMMENTING ON THE
PUBLIC RECIRCULATED DRAFT EIR**

Public Agencies

46. State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit, letter dated October 7, 2010

Local Organizations and Individuals

47. Anne M. Friel, letter dated September 15, 2010

48. Tobyann Mandel, letter dated October 5, 2010

49. Elizabeth A. Pollock, letter dated October 6, 2010

50. Del Rey Homeowners & Neighbors Association, Elizabeth Zamora, letter dated October 6, 2010

51. Del Rey Neighborhood Council, Eric De Sobe, letter dated October 6, 2010

3.3 TOPICAL RESPONSES

Several environmental issues were common to the letters received on the Draft EIR. Where a common environmental issue occurs multiple times, the reader is directed to the appropriate topical response found below. In many cases, additional language is provided in the body of the response itself where the topical response may not address a specific sub-component of an individual comment.

Topical Response 1: Project Density and Land Use Compatibility

The purpose of this topical response is to address comments received on the public Draft EIR that express concerns regarding the density of the proposed project in relation to the existing uses on and adjacent to the project site.

Several commenters state that the proposed project design proposes too many units, and is incompatible with surrounding land uses and the existing General Plan land use designation for the project site.

The project evaluated in the Draft EIR proposed 216 apartments in one building with a maximum height of four stories (60 feet) along with a 433-space parking structure with a maximum height of 4.5 stories (approximately 50 feet); a zone change from R-3-DP and R-1 to R-4-DP; and a general plan amendment to change the land use designation from Low Density Residential 1 to High Density Residential 4.

On July 15, 2010, the project developer submitted a revised project for consideration. The revised project proposes 196 apartments in multiple buildings with a maximum height of four stories (49 feet) along with 353 total parking spaces (329 spaces in a parking garage, 20 parking spaces in private garages, and 4 on-grade parking spaces opposite the leasing office). The 329-space parking garage would have a maximum height of 35 feet. Since the number of parking spaces to be provided by the proposed project is not consistent with current County Code requirements (a total of 394 spaces are required by County Code for apartments), a parking deviation for less than the required parking is being requested by the project applicant as a part of the project approval. The revised project will also require a yard modification for the proposed construction of an 8-foot-tall concrete block wall along the north property line, which will serve as a visual and noise buffer for the single family residences sited northerly of the project site.

Project Density

A residential density study was prepared and included in Appendix 4.1 of the Draft EIR for the proposed 216 unit project. The study conducted a parcel by parcel analysis of the relative density (dwelling units per area in acres) within a 1,000-foot radius from the project site. Density ranged from a low density figure of 3.63 dwelling units per acre to the highest density of 119.93 dwelling units per acre. The former

density is located immediately adjacent to the northeast of the project site on Beatrice Street. The latter density is located immediately adjacent to the project site on the south, fronting Jefferson Boulevard. The aggregate density within the unincorporated area of Los Angeles County is 19.16 dwelling units per acre, averaged for 312 units. The overall average density for all (3,512) parcels included in the study is 41.66 dwelling units per acre.

Figure 4.1-2, Surrounding Residential Density, included in the Draft EIR shows that three multi-family residential buildings to the south of the project site (the Club Marina Apartments) have a combined total of 154 units on 1.55 acres, which is a density of approximately 99 units per acre. The revised project (196 units) would have two ranks of density as indicated here (see **Section 2.0, Revisions to Draft EIR and Recirculated Draft EIR**) in modified **Figure 4.1-2, Surrounding Residential Density**: 177 units on 3.0 acres on the southern portion of the project site, or 59.0 units per acre, and 19 units on 1.3 acres on the northern portion of the project site, or 14.6 units per acre. The blended site-wide density of the proposed project design is 46.6 units per acre, which is almost half of the density of the existing multi-family residential uses located directly south of the project site boundaries in the City of Los Angeles. The residential density study shows that the project is compatible with the general density of the surrounding area and Section 4.1, Land Use and Planning, of the Draft EIR concludes that the proposed project is compatible with the density of the site and surrounding properties. Moreover, the revised project reduces the overall density by 20 units which lower the density per acreage on the project site. No additional or new information is needed that would trigger the need for recirculation of the Draft EIR based upon the criteria outlined in Section 15088.5.

Land Use Compatibility

The project site is situated in a diverse area characterized by a horizontal mix of land uses that include single-family homes, multi-family apartment buildings, and a variety of office and light industrial commercial uses. Recent development in the project area is primarily high-density residential in nature, particularly to the south and southwest, where the Playa Vista development is being constructed. There is also some neighborhood retail and service businesses in the area, which support the convenience shopping needs of the area's growing residential population. The project would continue the recent development of higher density residential and commercial uses that currently border the site and are present or are planned in the nearby Playa Vista project that is situated farther to the south and west, thereby contributing to the coherence of the community by being consistent with contemporary land uses.

The General Plan land use map currently designates the project site as Low-Density 1 (1 to 6 du/acre) while the zoning code designates the project site as R-3-DP (4.22 net acres) and R-1 (0.14 net acre). The proposed project proposes a change in these land use designations. As proposed, General Plan Land Use designation would be changed from Low-Density 1 to High Density 4 (22 or more du/acre), while the zoning designation would be changed from R-3-DP and R-1 to R-4-DP.

The current land use designation of Low-Density is inconsistent with the current multi-family R-3 zoning and is out-of-date with the existing prevalence of higher-density residential development adjacent to and nearby the project site. Thus, the consequence of the project's inconsistency with the existing General Plan Land Use Designation of Low-Density 1 must be evaluated in light of the existing land uses to determine if the project, as proposed, would itself be incompatible with adjacent and surrounding uses in the neighborhood.

The project analyzed in the Draft EIR was designed in consideration of the sensitive single-family residential uses to the north to ensure the project's physical compatibility with these residences. The proposed building height is limited to one and two stories along the northerly edge of the structure in proximity to the single-family residences located northerly of the site), and increases to three stories at the northwest corner, and to a maximum of four stories as the building transitions from north to south across the site toward the existing apartment complex that is sited adjacent to the subject property to the southeast. This design provides a height transition from the one-story single-family homes and private back yards along the northern perimeter to the mid-rise multi-family apartments on the southern boundary. In order to further ensure the project's physical compatibility with the single-family residences to the north, the project is designed with an open space buffer along the northerly side of the building. Along the northern boundary, the building would be set back a minimum of approximately 35 feet and a maximum of about 43 feet from the northern site boundary; two-story perimeter structures would not exceed 31 feet in exterior height (excluding chimney heights) along the northern project margin. At the northwest corner of the project site, a three-story portion of the building would reach a height of 40 feet. At approximately 80 feet from the northern property line, the building would transition to a height of four stories, or about 53.5 feet, exclusive of architectural projections at the roof line. The height of the parking structure would be 56 feet.

Moreover, the revised project further ensures the project's physical compatibility with surrounding uses. The revised project is designed with open space and two-story carriage units along the northerly side of the project site and provides a similar height transition from the single-story single-family homes located just northerly of the subject property. Along the northern boundary, the primary residential building would be set back a minimum of approximately 35 feet and a maximum of about 43 feet from the northern site boundary. The two-story perimeter structures would not exceed 28 feet in exterior height (excluding chimney heights) along the northern project margin, compared to 31 feet for the Draft EIR

project. At the northwest corner of the project site, a three-story portion of the building would reach a height of 39.5 feet. At approximately 80 feet from the northern property line, the building would transition to a height of four stories, or about 49 feet, exclusive of architectural projections. The height of the parking structure has been reduced from 56 feet to approximately 35 feet.

The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The revised project would increase the width of the existing alley from 25 feet to 28 feet to create more distance between the proposed parking garage and existing Club Marina apartment complex. The 35-foot-tall proposed parking garage would be 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary. The revised project would be more compatible with the surrounding uses.

Topical Response 2: Traffic and Access

The project's potential traffic and circulation impacts were assessed in a traffic study prepared by RAJU Associates, Inc. in December 2009. This traffic study is included as Appendix 4.5 Traffic Impact Analysis in the Draft EIR. This traffic study was prepared in consultation with the City of Los Angeles Department of Transportation (LADOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). Traffic and circulation impacts were assessed discussed and analyzed in Section 4.5, Traffic and Access, of the March 2010 Draft EIR. Additional analysis was prepared for the July 2010 Recirculated Draft EIR for Section 4.5, Traffic and Access, based on the revised project.

Several commenters raised concerns with the legitimacy of using trip credits in the analysis from the existing church use on the project site and the overall trip generation numbers from the proposed project, concerns related to use of the alley adjacent to the project site, and as well as the general traffic circulation concerns. Several commenters assert that the traffic impact analysis is flawed and requires revision and recirculation of the Draft EIR. The following information is derived from the traffic study and Section 4.5, Traffic and Access, which assessed the larger 216 residential unit version of the proposed project.

The trip credits utilized for the analysis in the traffic study are included in Table 4, Estimated Project Trip Generation, and Table 4.5-6, Project Vehicle Trip Generation, of the Draft EIR. The estimated trip credit for the church is 355 daily trips of which 22 trips occurred in AM peak hour and 21 trips occurred in the PM peak hour. These trip credit estimates were based on trip generation rates for a church use per ITE Trip Generation, 8th Edition, Informational Report. The trip credits and methodology used for implementation in the study were also approved by the City of Los Angeles Department of Transportation (LADOT) and the County of Los Angeles Department of Public Works, Traffic and Lighting Division staff members.

Trip Credits

The proper environmental baseline for evaluating environmental impacts under CEQA is the existing condition on the project site at the time CEQA analysis is commenced. CEQA establishes the environmental baseline as:

“the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” [emphasis added]

When the Notice of Preparation was published, the Church leased parking spaces to Chiat Day and others on the project site. The trips generated by Chiat Day and others using the project site for daily parking was greater than the trip generation of the previous church use. Although the number of trips generated by Chiat Day and others was greater, the traffic consultant, LADOT and LACDPW, agreed to conservatively only account for the trip credit from a church use using the ITE trip generation data as discussed above.

Several commenters expressed concern that the proposed project would increase the number of vehicles utilizing the existing alley to the south of the project site and would create a significant impact. The traffic study prepared by RAJU Associates, Inc determined that the east-west alley between the project site and the apartment buildings on Jefferson Boulevard currently carries approximately 1,060 daily trips of which 930 trips (87.5%) travel in the eastbound direction.

The alley system around the site currently provides a connection between Grosvenor Boulevard and Centinela Avenue via Juniette Street. Typically, alleys are designed to provide local access, as a separation between residential and commercial uses and for trash pick-up, deliveries etc. The current east-west alley does not provide any access to any of the properties that are adjacent to it and therefore, is functioning only as an alternate route to get to Jefferson Boulevard eastbound and Centinela Avenue northbound from Grosvenor Boulevard via Juniette Street. Traffic along this alley is highly directional – 87.5 percent of the daily traffic on the alley is traveling eastbound. This phenomenon can be explained by the following: Traffic from Grosvenor Boulevard traveling to Jefferson Boulevard eastbound has to cut across several lanes of fast-moving westbound Jefferson Boulevard traffic to merge with fast-moving eastbound Jefferson Boulevard traffic. In order to negotiate these movements and accomplish that, the Grosvenor Boulevard traffic would have to find “simultaneous acceptable gaps” in fast-moving Jefferson Boulevard traffic. Due to the difficulty in achieving this, Grosvenor Boulevard office traffic is currently using an alternate route through the east-west alley and the north-south alley to access the Juniette Street and Centinela Avenue intersection, where it can turn right or left to access Centinela southbound (to Jefferson eastbound) or Centinela northbound, respectively. Currently, this is possible given that the turns at Juniette and Centinela intersection are able to find “acceptable gaps” (also facilitated by the “KEEP CLEAR” and “DO NOT BLOCK INTERSECTION” signage at the intersection) along Centinela Boulevard. As traffic increases along Centinela Boulevard with build out of the Playa Vista First Phase Project, these gaps would also become difficult to find. The inbound Grosvenor Boulevard traffic is able to make the right-turns at Grosvenor and Jefferson intersection without constraint and therefore, this traffic is not using the alley system but rather utilizing the regional transportation system (Jefferson Boulevard) to Grosvenor Boulevard. Hence, the traffic in the westbound direction of the alley is only 12 percent of the total daily two-way count at the alley.

Vehicular access to and from the proposed parking structure would be provided via an entrance accessible from a proposed new private driveway and fire lane located along the northern property boundary. In addition, a southern access point from the parking structure would be to the existing but widened alleyway. Vehicles would access the entrance along the northern driveway from Grosvenor Boulevard. Vehicles would use the exit along the southern alleyway to reach Grosvenor Boulevard.

With the proposed project, the intersection of Grosvenor and Jefferson Boulevard would be signalized and the proposed project and existing traffic along Grosvenor would be able to utilize the same to travel to the regional transportation system in a regulated and orderly manner. The provision of this signal would direct and send traffic to the appropriately controlled regional intersections rather than find the alternate route along the alley system to a different unsignalized intersection. The traffic volumes along the alley would likely be dramatically lower than the current traffic due to the provision of this signal at Grosvenor Boulevard and Jefferson Boulevard and the roadway system would operate in a balanced manner. This alley cut-through traffic would decrease with the provision of the signal.

Impacts Summary

Table 4, Estimated Project Trip Generation of the traffic study indicates that the proposed project would produce a net additional 1,078 daily trips, of which 88 trips are estimated to occur during the AM peak hour and 115 trips are estimated to occur in the PM peak hour.

The traffic analysis indicates that none of the analyzed intersections would be significantly impacted by the proposed project with the exception of the intersection of Grosvenor Boulevard and Jefferson Boulevard during the morning peak hour. Therefore, the project would result in a significant cumulative impact prior to mitigation. A traffic signal at the intersection of Grosvenor Boulevard and Jefferson Boulevard would fully mitigate the project-related impact at this location. With provision of a traffic signal at the intersection of Grosvenor Boulevard and Jefferson Boulevard, traffic in the project vicinity would be better regulated and would flow better. The intersection at Grosvenor Boulevard and Jefferson Boulevard would be operating at a LOS B in the future with the Project.

Additionally, a traffic signal at this location would allow for safe left turns in and out of Grosvenor Boulevard and provide a safer pedestrian connection to destinations within Playa Vista located south of the project site.

Topical Response 3: Project Design and Height

The purpose of this topical response is to address project design features, the number of proposed structures, the height of proposed structures, and the description of existing off site uses adjacent to the project site.

The proposed project described in the Recirculated Draft EIR is a request to develop the project site with 196 apartments in one primary building with a maximum height of four stories (49 feet; 51 feet at the stairwell towers) and three two-story buildings (22 feet) at the northwest property boundary. The proposed project includes a 329-space parking structure with a maximum height of four stories (approximately 35 feet) in addition to 20 private garage spaces and four surface parking spaces opposite the leasing office along the northwest property boundary. The existing church, parking lot, and one single-family residence will be removed as a part of the proposed project. Vehicular egress only will be provided by an existing alley south of the project site, and vehicular ingress and egress will be provided by a new private driveway and fire lane along the northern part of the site.

The proposed project consists of one, primary, maximum four-story apartment building and five one-bedroom carriage units in three structures, collectively containing a total of 196 apartment units. The apartment building is designed to be organized on three sides (to the north, east and west) around a four-story-deck (approximately 35-feet high) aboveground parking structure and incorporates open courtyard areas. Emphasis has been placed on a building design that provides a graduated-height transition along the northern and southern site perimeters. Building height is limited to two stories (28 feet) along the northerly edge of the structure (in proximity to the single-family residences located northerly of the site), and increases to a maximum of four stories (approximately 49 feet) as the building transitions from north to south across the site toward the existing apartment complex that is sited adjacent to the subject property to the south. The four-story portion of the apartment building are along the western and eastern perimeters and adjacent to the parking structure. A total of 353 parking spaces (329 spaces in a parking garage, 20 parking spaces in private garages, and 4 on-grade parking spaces opposite the leasing office) would be provided as a part of the proposed project. The 329-space parking garage would have a maximum height of 35 feet and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with facades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural façades to the exterior, the air quality, noise, and aesthetics impacts are further reduced through project design features to a level of insignificance. The number of parking spaces is not consistent with current County Code requirements (a total of 394 spaces are required by County Code for apartments) and a parking deviation for less than the required parking is being requested by the project

applicant as a part of the project approval. The proposed project would also include four courtyards, an outdoor pool in courtyard one, a leasing office, a fitness center, and rest rooms. The existing (25-foot-wide) alleyway that occurs along the southern perimeter of the site would be widened to 28 feet. All interior spaces would be air conditioned.

The proposed project will require a yard modification for a proposed 8-foot-tall concrete block wall along the north property line, which will serve as a visual and noise buffer for the single family residences site northerly of the project site.

The proposed buildings would cover approximately 50 percent of the site while the parking structure would cover about 15 percent of the site. The courtyards, fire lanes and other vehicle and pedestrian circulation routes and exterior landscaping associated with the building would cover the remaining 35 percent of the project site.

The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The proposed project will increase the width of the existing alley from 25 feet to 28 feet to create more distance between the proposed parking garage and existing Club Marina apartment complex. Further, the proposed parking garage will have a maximum height of 35 feet, which is 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary.

From: Young, Joe [mailto:JYOUNG@dpw.lacounty.gov]
Sent: Monday, March 29, 2010 8:16 AM
To: Curzi, Anthony
Cc: Banuelos, Eric; Crittenden, Jimmie; Gabriel, Anna
Subject: Comments on Draft EIR for proposed 216 unit apartment complex at 5550 Grosvenor Boulevard, LA, CA 90066

1

The Los Angeles County Department of Public Works, Road Maintenance District 3 has concerns regarding the proposed 216 unit apartment complex. The notice of public hearing states that the project is proposed to be accessed via Grosvenor Blvd and an existing alley on Juniette Street.

Our Department has the following comments:

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1. Due to increased traffic on Grosvenor Blvd and Juniette St, we request that the developer of the site be required to reconstruct both streets to withstand the increased vehicle traffic.

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2. For the same reasons, we request the developer to install a commercial style driveway apron at all driveway approach areas from the streets to minimize any concrete failures due to increased traffic. A commercial driveway apron is 6 inches thick as compared to a residential driveway which is 4 inches thick.

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3. Any proposed trees to be planted in the county parkway (which would be maintained by our office) need to be reviewed by our office and the species and location approved prior to planting. In some cases we have recommended that no trees be planted due to utility conflicts and lack of space.

4. Any trees planted need to be planted per county Standard Plans for Public Works Construction 518-2; 519-2; 520-3.

Joseph B. Young

Civil Engineer

5

Road Maintenance District 3

5530 West 83rd Street

Los Angeles, CA 90045

Phone (310) 348-6448 Ext 233

Fax (310) 649 0402

3.4 RESPONSES TO WRITTEN COMMENTS

Comment Letter No. 1

Joseph B. Young, Civil Engineer
County of Los Angeles Department of Public Works
Road Maintenance District 3
5530 West 83rd Street
Los Angeles, California 90045
E-mail Dated March 29, 2010

Comment 1.1

This comment states that the Los Angeles Department of Public Works has concerns regarding the proposed project. The comment does not state a specific concern or question regarding the adequacy or content of the Draft EIR. Consistent with *California Environmental Quality Act (CEQA) Guidelines* Section 15088(c), no further response is required. The comment is acknowledged and will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 1.2

This comment requests that the project applicant be required for reconstructing both Grosvenor Boulevard and Juniette Street to accommodate increases in vehicular traffic from the proposed project. The proposed project's traffic would not impact the existing traffic and circulation in the vicinity of the site. With provision of a traffic signal at the intersection of Grosvenor Boulevard and Jefferson Boulevard, traffic in the project vicinity would be better regulated and would flow better and the proposed project would not cause any significant impacts at any of the locations analyzed in the traffic study (please see Tables 5 and 6 in the Traffic Study for additional information). The intersection at Grosvenor Boulevard and Jefferson Boulevard would be operating at a LOS B in the future with the Project. The commenter presents no substantial evidence that increased traffic from the proposed Project would damage Grosvenor Boulevard and Juniette Street and would require reconstruction. Nevertheless, after discussion with the County of Los Angeles Department of Public Works, the applicant has agreed to contribute a fair-share amount of funds to resurface these two streets.

Comment 1.3

This comment requests that the project applicant install commercial style driveway aprons at all driveway approach areas on the project site from local streets to minimize concrete failures due to increased traffic. The commenter presents no substantial evidence that increased traffic from the proposed residential project would require thicker commercial style driveway aprons. Nevertheless, the applicant agrees to construct commercial style driveway aprons.

Comment 1.4

The comment recommends that any street trees planted in the County public parkway needs to be reviewed by the Road Maintenance Division of the Department of Public Works. The proposed project shall include a final landscape plan. That landscape plan shall be submitted to County of Los Angeles Department of Public Works Road Maintenance District 3 staff for review and approval.

Comment 1.5

This commenter requests that trees planted need to be planted per County Standard Plans for Public Works construction. Any trees planted as a part of the proposed project shall be planted per County Standard Plans for Public Works Construction 518-2, 519-2, and 520-3.



Margaret Donnellan Todd
County Librarian

April 13, 2010

County of Los Angeles Public Library ■ www.colapublib.org
7400 East Imperial Hwy., Downey, CA 90242 ■ (562) 940-8400



TO: Anthony Curzi
Regional Planning Assistant
Impact Analysis Section
Department of Regional Planning

FROM: Terri Maguire *Terri Maguire*
Chief Deputy County Librarian

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT
MILLENNIUM - PLAYA DEL MAR APARTMENTS PROJECT
COUNTY PROJECT NO. R2009-02015**

This is to provide you with comments on the Draft Environmental Impact Report (DEIR) for the Millennium-Playa Del Mar Apartments Project, which were previously sent by the Public Library but were not addressed in the DEIR.

- The Culver City Julian Dixon Library is not a branch. On page 5.0-10, please delete the word "branch" in the last sentence of the first paragraph.
- The following sentence, on page 5.0-11, should be edited as follows:

"The actual fee obligation for this project may be higher because the fee per residential unit will be **that** in effect at the time building permits are issued."

This is also to clarify that, while the DEIR states that the Culver City Julian Dixon Library could currently accommodate the Project's new 480 residents in terms of facility space and library materials, the available capacity at this Library may change due to the cumulative impact of other development projects, and any required changes to the County Library's service level guidelines.

We also want to add that the Culver City Julian Dixon Library does not currently meet the County Library's service level guideline for public access computers of 1.0 per 1,000 people served. While this comment was overlooked in the Public Library's prior responses, it is important to address this guideline in the DEIR because changes in technology have greatly affected libraries in terms of service delivery, demand for services, and the way libraries are designed. The Library currently has 26 public access computers.

Anthony Curzi
April 13, 2010
Page 2

If you have any questions or require additional information regarding this matter, please contact Malou Rubio at (562) 940-8450 or mrubio@library.lacounty.gov.

TM:MR:MB:vm

U:\STAFFSERVICES\DEVELOPER FEE\EIR\Playa Del Mar - Millennium DEIR.doc

c: Yolanda De Ramus, Assistant Director, Administrative Services
Malou Rubio, Head, Support Services Section
Robert Seal, Library Administrator, Public Services Administration

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Comment Letter No. 2

Terri Maguire, Chief Deputy County Librarian
County of Los Angeles Public Library
7400 East Imperial Highway
Downey, California 90242
Letter Dated April 13, 2010

Comment 2.1

The comment provides a general introduction to the letter. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 2.2

This comment requests an editorial change to the text of the Draft EIR. This requested revision has been noted. The word “branch” is deleted on Page 5.0-10 of the Draft EIR in the last sentence of the first paragraph under “Libraries”. That sentence now reads “Current services provided by the Culver City Julian Dixon Library are considered adequate.”

Comment 2.3

This comment requests an editorial change to the text of the Draft EIR. This requested revision has been noted. The word “that” has been inserted to the following sentence on page 5.0-11 of the Draft EIR and revised as requested: “The actual fee obligation for this project may be higher because the fee per residential unit will be that in effect at the time building permits are issued.”

Comment 2.4

This comment states that the availability of capacity at Culver City Julian Dixon Library may change in the future because of cumulative impacts of other (future) development projects, and any required changes to the County Library’s service level guidelines. The Draft EIR adequately analyzed the demand on existing library facilities from the proposed project. Based on the County’s current services level guidelines for library planning purposes of 2.75 items (books, magazines, periodicals, etc.) and 0.50 square foot of library facilities per capital, demands on library services and facilities from the project’s anticipated increase in residents could currently accommodate the Project’s new residents in terms of facility space and library materials. This comment is noted and has been forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 2.5

This comment states that the Culver City Julian Dixon Library does not currently meet the County Library's service level guideline for public access computers of 1.0 per 1,000 people served. The proposed project would be required to pay County adopted library facilities mitigation fees, which could assist in meeting the County Library's service level guideline for public access computers.

Comment 2.6

This comment provides contact information for the County Library. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines Section 15088(c)*, no further response is required.



CHARLES D. HERBERTSON
Public Works Director/City Engineer



PUBLIC WORKS DEPARTMENT
9770 CULVER BOULEVARD, 2ND FLOOR
CULVER CITY, CALIFORNIA 90232-0507



Phone (310) 253-5600
FAX (310) 253-5626

April 22, 2010

Mr. Srinath Raju
Raju Associates, Inc.
524 S. Rosemead Boulevard
Pasadena, California

Dear Mr. Raju:

Re: 5550 Grosvenor Boulevard - Millennium Playa Del Mar Residential Project

We have reviewed the Millennium Playa Del Mar Residential Project report dated December 2009. The development is located at 5550 Grosvenor Boulevard in an unincorporated area of Los Angeles County. It consists of 216 multi-family dwellings, estimated to generate a net total of 88 trips during the morning peak hour and 115 trips during the evening peak hour.

The report on page 5 and elsewhere should indicate the jurisdiction of each intersection. The intersections numbered 4, 13 and 14 are in Culver City. In Appendix B, Intersection Lane Configurations, the report should indicate which development is responsible for the changes between Existing 2009 and Year 2013 Conditions indicated at intersections 1, 4, 6, 7 and 10. Also indicate "ATSAC" instead of "A" at the intersections.

We agree with the findings of the report that the development should not have an impact at any intersection in Culver City.

Figure 6 should be labeled "Related Projects Only Peak Hour Traffic Volumes."

If you have any questions, please call Barry Kurtz at 310.253.5625.

Sincerely,

Charles D. Herbertson, P.E., L.S.
Public Works Director/City Engineer

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Comment Letter No. 3

Charles D. Herbertson, Public Works Director/City Engineer
9770 Culver Boulevard, Second Floor
Culver City, California 90232
Letter Dated April 22, 2010

Comment 3.1

This comment describes the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 3.2

This comment requests an editorial change to the text of the traffic impact study prepared for the proposed project by Raju Associates that was included in the appendices of the public Draft EIR. This requested revision has been noted and that the intersections numbered 4, 13 and 14 are within the jurisdiction of Culver City. The proposed text changes do not change the adequacy or conclusions of the traffic study and Draft EIR. No further comment is necessary.

Comment 3.3

This comment affirms that the City of Culver City agrees with the findings of the Draft EIR that the proposed project should not have a significant traffic impact on any intersections located within the City of Culver City. No further response is required.

Comment 3.4

This comment requests an editorial change to the text of the traffic impact study prepared for the proposed project by RAJU Associates that was included in the appendices of the public Draft EIR. This requested revision has been noted that Figure 6 should be labeled "Related Projects Only Peak Hour Traffic Volumes."



BILL ROSENDAHL

City of Los Angeles
Councilmember, Eleventh District

Committees

Chair, Transportation
Vice Chair, Trade, Commerce & Tourism
Member, Budget & Finance
Member, Ad Hoc on Economic Recovery & Reinvestment
Member, Board of Referred Powers

April 27, 2010

Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

Re: Draft Environmental Impact Report, Playa Del Mar Apartments Project
5550 Grosvenor Boulevard


Dear Mr. Curzi:

I am writing to express my concerns regarding the proposed project located at 5550 Grosvenor Boulevard, in an unincorporated section of the county. Although this property is outside of the City of Los Angeles, the district I represent surrounds the project area, and the families who will be most impacted by this project reside within the City of Los Angeles.

My constituents who live near this project, in the Los Angeles community of Del Rey, have serious concerns about this project. With the proposed increases in height and density, this 216 unit apartment complex potentially threatens this neighborhood's quality of life. My constituents' concerns include, but are not limited to: increased traffic congestion on already gridlocked residential streets, and noise and air pollution from an above-grade parking structure that is out of character and scale with the adjacent community.

As a result of these concerns, I join the Del Rey Neighborhood Council and the Del Rey Homeowners and Neighbors Association in urging Los Angeles County to deny the request for a general plan amendment and to deny the request for a zone change. If you have any questions, please contact my Field Deputy, Nancy Franco, at nancy.franco@lacity.org (310)568-8772.

Regards,


BILL ROSENDAHL
Councilmember, 11th District

Cc: Los Angeles County Supervisor Mark Ridley Thomas

BR:Nf/nf

Westchester Office
7166 W. Manchester Boulevard
Westchester, CA 90045
(310) 568-8772
(310) 410-3946 Fax

City Hall
200 N. Spring Street, Room 415
Los Angeles, CA 90012
(213) 473-7011
(213) 473-6926 Fax

West Los Angeles Office
1645 Corinth Avenue, Room 201
Los Angeles, CA 90025
(310) 575-8461
(310) 575-8305 Fax



Comment Letter No. 4

Bill Rosendahl, Councilmember, 11th District
City of Los Angeles
City Hall
200 North Spring Street, Room 415
Los Angeles, California 90012
Letter Dated April 27, 2010

Comment 4.1

This comment expresses general concern about the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 4.2

This comment describes concerns raised by constituents of Councilmember Rosendahl's district located in the City of Los Angeles, adjacent to the project site. The letter suggests that the proposed project could potentially impact the neighborhood's quality of life in regards to increased density and height, increased traffic congestion, noise and air quality from the above-grade parking structure, and compatibility and scale of the above-grade parking structure with the adjacent community.

The commenter is directed to **Topical Response 1: Density and Land Use Compatibility** for a detailed response regarding proposed density, scale and compatibility of the project with the surrounding neighborhood. The Draft EIR concluded that the proposed project is compatible with the density, scale, and land uses in the immediate and surrounding area. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of that the conclusions in the Draft EIR are not adequate.

The Draft EIR concluded that the proposed project would create a less than significant impact with regarding to traffic and access after the provision of a traffic signal at Jefferson and Grosvenor. Please refer to **Topical Response 2: Traffic and Access** for a complete summary of the project's traffic and access analysis.

Section 4.3, Noise, of the Draft EIR analyzed potential noise impact of the garage and access. The existing alley that runs along the southern boundary of the project site would be widened from 25 to 28 feet and provide access to the proposed parking structure within the southern portion of the project site. Immediately south of the alley are multi-family residences. The residential units within the adjacent multi-family residential buildings are elevated approximately 10 feet above on-site parking garages. Vehicles traveling along the alleyway are generally not expected to exceed a speed of 15 miles per hour

(mph) based on the length and width of the alley and because vehicles would slow to access the parking structure. As discussed in Section 4.5, Traffic and Access, of the draft EIR, the proposed project would result in 1,078 daily vehicle trips. As described above, the noise associated with all project-generated trips along a 28-foot-wide roadway at a distance of 8 feet would be 57.4 dB(A) CNEL. As shown in Table 4.3-4 of the Draft EIR, the existing noise levels within the southern portion of the project site currently exceed 57.4 dB(A) CNEL and the County of Los Angeles standard. Noise levels at the existing multi-family residences would be very similar to those on the project site because stationary and mobile noise sources are the same for both. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise at the adjacent multi-family residences. Impacts would be less than significant.

The proposed parking garage would be enclosed with mechanical ventilation to reduce noise and vehicle emissions along the southern alley. Multi-family residences located adjacent to the south of the project site would be approximately 37 feet south of the parking structure after project construction. Since the enclosed structure would act as a barrier, most noise generated by vehicles traveling within the parking structure such as tires squealing, car alarms sounding, car stereos and horns honking would be attenuated by the enclosed structure. These sources of noise may be barely audible at the northernmost residential units within the adjacent multi-family complexes and may result in temporary annoyances. However, this noise would be temporary and periodic and occur most intensely during the AM and PM peak periods when project residents are leaving or returning from work. Further, the proposed parking structure is not anticipated to introduce a substantial permanent noise source that would exceed defined County Standards in the ambient noise level. Therefore, impacts would be less than significant.

Construction and operational air quality impacts anticipated to result from the proposed project were assessed in Section 4.4, Air Quality of the Draft EIR. On page 4.4-65 of the Draft EIR, it is stated that "VOC [Volatile Organic Compounds] emissions would exceed SCAQMD's [South Coast Air Quality Management District's] threshold of significance during 2012; therefore, construction of the proposed project would have a significant impact on air quality." The Draft EIR also analyzed air quality impacts from operation of the proposed project and concludes this impact would be less than significant after implementation of mitigation measures.

For a complete discussion, project and cumulative level construction and operational impact analyses were analyzed in the Draft EIR for traffic and access (Section 4.5), visual resources (Section 4.6), air quality (Section 4.4) and noise (Section 4.3). Impacts and mitigation measures were described for each of these environmental topics in regards to construction and operation of the project.

Comment 4.3

This commenter states opposition to the request general plan amendment and zone change and will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

May 4, 2010

Anthony Curzi
Los Angeles County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012-3225

MAY 12 2010

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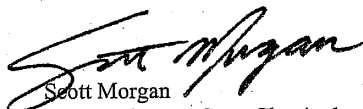
Subject: Millennium - Playa Del Mar Apartments Project/Project R2009-02015
SCH#: 2006101104

Dear Anthony Curzi:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 3, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,


Scott Morgan
Acting Director, State Clearinghouse

2

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2006101104
Project Title Millennium - Playa Del Mar Apartments Project/Project R2009-02015
Lead Agency Los Angeles County

Type	EIR Draft EIR
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Description	The proposed project is a request for a Conditional Use Permit to allow 216 apartments in one building with a maximum height of four stories (60 feet) along and a 433-space structure with a maximum height of five and one half stories (56 feet); a zone change from R-3-DP and R-1 to R-4-DP; and a general plan amendment to change the land use designation from Low Density Residential 1 to High Density Residential 4. The existing church, parking lot, and single-family residence will be removed. The project will require on-site grading of 31,700 cubic yards of cut of which 15,000 cubic yards of soil would be exported from the site and 16,700 cubic yards of fill to be used on-site. Ingress and egress will be provided by an existing alley south of the project site and a new fire alley along the northern part of the site.
--------------------	--

Lead Agency Contact

Name	Anthony Curzi	
Agency	Los Angeles County Department of Regional Planning	
Phone	213-974-6461	Fax
email		
Address	320 W. Temple Street	
City	Los Angeles	State CA Zip 90012-3225

Project Location

County	Los Angeles		
City	Los Angeles, City of		
Region			
Lat / Long			
Cross Streets	Jefferson Boulevard and Grosvenor		
Parcel No.	4211-003-068 & 4211-003-041		
Township	Range	Section	Base

Proximity to:

Highways	I-405
Airports	LAX
Railways	
Waterways	Ballona Creek
Schools	
Land Use	Church/R-3-DP (Limited Multiple Residential & R-1 (Single Family Residence)/Category 1-Low Density Residential

Project Issues	Geologic/Seismic; Noise; Traffic/Circulation; Aesthetic/Visual; Drainage/Absorption; Public Services; Solid Waste; Water Quality; Water Supply; Landuse; Cumulative Effects; Soil Erosion/Compaction/Grading; Air Quality
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Reviewing Agencies	Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission
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Date Received	03/18/2010	Start of Review	03/18/2010	End of Review	05/03/2010
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Note: Blanks in data fields result from insufficient information provided by lead agency.

Comment Letter No. 5

Scott Morgan, Acting Director
State Clearinghouse and Planning Unit
State of California Governor's Office of Planning and Research
1400 10th Street
PO Box 3044
Sacramento, California 95812
Letter Dated May 4, 2010

Comment 5.1

This comment acknowledges receipt of the public Draft EIR, advises that no state agencies submitted comments on the Draft EIR, and that the Draft EIR complies with the State Clearinghouse review requirements. No further response is required.

Comment 5.2

This comment provides contact information for the State Clearinghouse. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.



Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

May 4, 2010

Anthony Curzi
Department of Regional Planning
Impact Analysis Section, Rm. 1348
320 W. Temple Street
Los Angeles, CA 90012

1

Dear Mr. Curzi:

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft Environmental Impact Report for the Millennium–Playa Del Mar Apartments Project. This letter conveys recommendations concerning issues that are germane to Metro’s statutory responsibilities in relation to the proposed project.

Several transit corridors with Metro bus service could be impacted by the project. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators, including LADOT may also be impacted and therefore should be included in construction outreach efforts.

2

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

3

Sincerely,

Susan F. Chapman
Program Manager, Long Range Planning

MAY - 6 2010

Comment Letter No. 6

Susan F. Chapman, Program Manager
Long Range Planning
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
Letter Dated May 4, 2010

Comment 6.1

This comment states Metro received the Draft EIR and describes the general nature of the letter and will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment does not state a specific concern or question regarding the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 6.2

The commenter states that several transit corridors could be impacted by construction of the proposed project and requests that prior to project construction, the Metro Bus Operations Control Special Events Coordinator and LADOT should be contacted in order to be provided project construction information. The commenter provides no substantial evidence that construction of the proposed project would impact public transit service. The Draft EIR analyzed construction traffic impacts and concluded that the proposed project would not adversely reduce the operating efficiency on adjacent streets during project construction. Please refer to Draft EIR Section for 4.5.4.3.2 for additional detail.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 6.3

The comment states the Metro looks forward to reviewing the Final EIR and provides contact information for questions regarding contents the letter. This Final EIR will be provided to the Metropolitan Transportation Authority for their review. No further response is necessary.

Sent: Friday, March 19, 2010 9:13 PM
To: Curzi, Anthony
Subject: Playa del Mar Apartment Project (County Project No. R2009-02015)

Case Nos. RENVT200600147, RCUPT200900150, RZCT200900013, PAT2009000013

As a neighbor of the apartment project proposed for the former church site at Centinela north of Jefferson, I am once again struck by the absence of restraint regarding projects in my area (Mar Vista/Del Rey). Residents of this area are not fundamentally anti-development, but they ask: What has happened to scale? Developers are unfettered, and permitted to squeeze inappropriately large projects onto small lots, without regard to traffic (which is already gridlocked), the overall community, environmental concerns, and lastly aesthetics (a quaint concept that has disappeared almost completely). [We are inevitably led to the conclusion that developers must run local government, because they so blatantly get their way. How else to explain the total absence of common sense and concern for consequences of recent developments?

The proposed Playa del Mar Apartment project is a prime example of this. This project is adjacent to established, single family neighborhoods. Who with any scruples would consider a 60 foot monolith looming over these modest homes? No one is saying all development is evil, but how about something sympathetic to the neighborhood? Must greed and a quick buck always prevail? We are hoping Los Angeles County Planning will at last take the high road and say "no" to overdevelopment. Do something you will be proud of and maybe, just maybe, this idea will catch on.

Leonard and Valerie Brownrigg
4220 Neosho Avenue
Los Angeles, CA 90066
(310) 391-5603

1

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Comment Letter No. 7

Leonard and Valerie Brownrigg
4220 Neosho Avenue
Los Angeles, California 90066

Comment 7.1

These commenters live approximately 2 miles from the project site and express general concerns about development projects in the area. No additional response is necessary.

Comment 7.2

The comment states that development projects in general are built without regard to traffic. The Draft EIR fully analyzed the traffic and access impacts of the proposed project. A detailed traffic study for the original 216-unit project design was prepared by Raju Associates, Inc., in December 2009. A complete copy of this traffic report is included in Appendix 4.5 of the Draft EIR. The traffic report has been reviewed and approved by the County of Los Angeles Department of Public Works (reference approval letter incorporated as part of Appendix 4.5). No analyzed intersection would be significantly impacted by the proposed project with the exception of the intersection of Grosvenor Boulevard and Jefferson Boulevard during the morning peak hour. However, this significant impact is mitigated to a level of insignificance by installing a traffic signal, including the provision of an Automated Traffic Surveillance and Control (ATSAC) System and Adaptive Traffic Control System (ATCS), at the intersection of Grosvenor Boulevard/Jefferson Boulevard. For a detailed response in regards to the general concern about traffic related to the proposed project, please refer to **Topical Response 2: Traffic and Access** and Draft EIR Section 4.5, Traffic and Access.

Comment 7.3

The comment states that development projects in general are built without regard to aesthetics. Aesthetics, light, and glare were all assessed in detail in the originally circulated public Draft EIR in Section 4.6, Visual Resources and again in the Recirculated Draft EIR. Project and site-specific visual simulations and renderings were prepared for aesthetics impact analysis. Additionally, project and site-specific shade and shadow simulations were prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the existing apartment buildings along Jefferson Boulevard because the structures included in the proposed project would be to the north of the existing structures. This analysis is found subsection 4.6.4.4, Project Analysis (Shade/Shadow). Please also refer to **Topical Response 3: Project Design and Height**. In addition, the Draft EIR concluded that the existing character of the site is not one of high visual quality and the project would not degrade this existing visual character of the site. The project utilizes an architectural design

that would provide a height transition between adjacent properties, and would have professionally designed architectural features and landscaping that are aesthetically pleasing.

Comment 7.4

The comment expresses opinion regarding the lack of concern and consequences of recent development in the area. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 7.5

The comment expresses further opinion and position on the proposed project but does not state a specific concern regarding the content and adequacy of the Draft EIR. No further comment is necessary.

April 7, 2010

APR 21 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
Case Nos.: RENV200600147, RCUPT200900150, RZCT200900013, RPAT2009000013

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The General Plan land use map currently designates the project site as Low-Density 1 (1 to 6 du/acre) while the zoning code designates the project site as R-3-DP (4.22 net acres) and R-1 (0.14 net acre). The proposed project wants a change in these land use designations. As proposed, General Plan Land Use designation will be changed from Low-Density 1 to High Density 4 (22 or more du/acre), while the zoning designation will be changed from R-3-DP and R-1 to R-4-DP. This is an extreme upzoning that is discordant with our existing neighborhood.

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In 2008 a development of the same height and same density was proposed in this location. Residents requested a reduction of the height and density. The project was also opposed by the Del Rey Neighborhood Council, the Del Rey Homeowners & Neighbors Association and our neighboring LA City Councilmember Bill Rosendahl.

4

I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

Sincerely,

Dennis KITAGAWA  4-19-10
Huei-HSIANG CHOW  4-19-10

5

April 7, 2010

APR 12 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

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Sincerely,


NOBUO SUGIYAMA

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April 7, 2010

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Department of Regional Planning
320 West Temple Street, Room 1348
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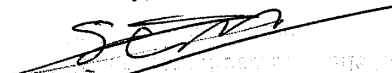
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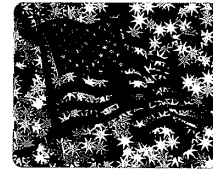
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SHONORI SUGIYAMA

April 7, 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

APR 12 2010



RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
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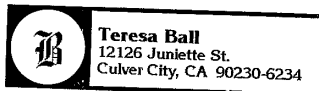
Tom Ball

310-5770084



Thomas B Ball
12126 Juniette St
Culver City CA 90230

5



Teresa Ball

Julie Ball

April 7, 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
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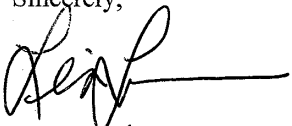
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Sincerely,

5


Lisa Lee
(310) 308-6033

APR 12 2010

April 7, 2010

APR 12 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
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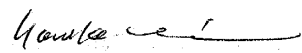
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Sincerely, 
Tomoko Sugiyama

April 7, 2010

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Department of Regional Planning
320 West Temple Street, Room 1348
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Case Nos.: RENV200600147, RCUP200900150, RZCT200900013, RPAT2009000013*

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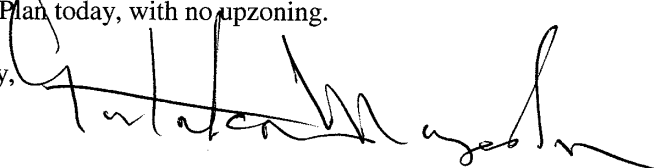
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MAY - 5 2010

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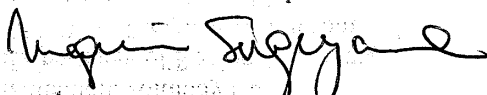
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Sincerely,


MEGUMI SUGIYAMA

APR 12 2010

4/12/2010

April 7, 2010

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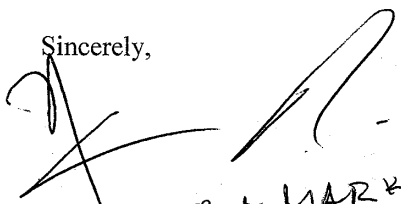
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JENNIFER + MARK OKI
12105 LUCILE ST.
CULVER CITY, CA 90230

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APR 13 2010

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Kim Shrock

12460 Lucile ST
LOS ANGELES, CA 90066

APR 27 2010

April 7, 2010

APR 27 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

*RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
Case Nos.: RENV200600147, RCUPT200900150, RZCT200900013, RPAT2009000013*

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I am writing to oppose any change of zoning to accommodate the Millennium Playa Del Mar Project. The project proposes to add 216 apartment units (60 feet tall) along with a 433-space parking structure (56 feet tall) in the heart of a neighborhood of single story homes in Del Rey. The General Plan calls for low density in this area. The enormity of this project conflicts with existing land use plans of the General Plan. I am a resident of Del Rey and I believe our families will be negatively impacted by the increased noise, diminished air quality, dangerous traffic and access, and incompatible aesthetics that will rob all neighbors of the quality of life we enjoy today.

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Sincerely,

Mary L. Shockey
(Mickey)
12460 Suite Street
Los Angeles, CA
LA County 90066

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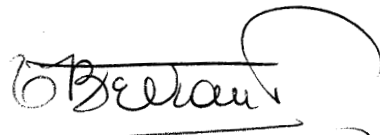
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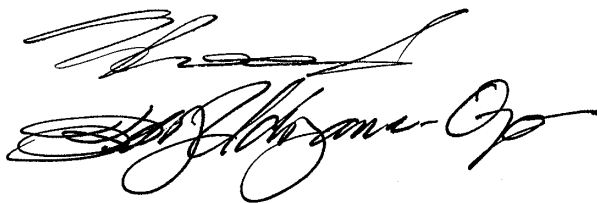
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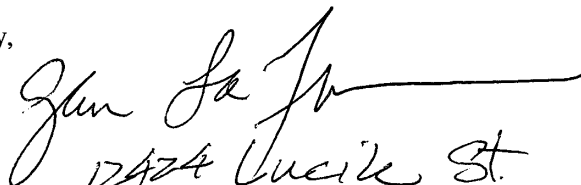
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12424 Lucile St.
L.A., CA 90066

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APR 22 2010

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Paul Gumbor

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Carol Gumbor

*12434 Lucile St, Los Angeles, CA
90066*

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MAY 3 - 2010

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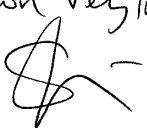
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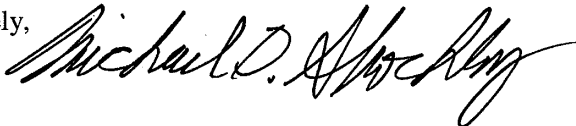
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I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

Sincerely,

Patricia Cancel

5

April 7, 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

*RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
Case Nos.: RENV200600147, RCUP200900150, RZCT200900013, RPAT2009000013*

1

I am writing to oppose any change of zoning to accommodate the Millennium Playa Del Mar Project. The project proposes to add 216 apartment units (60 feet tall) along with a 433-space parking structure (56 feet tall) in the heart of a neighborhood of single story homes in Del Rey. The General Plan calls for low density in this area. The enormity of this project conflicts with existing land use plans of the General Plan. I am a resident of Del Rey and I believe our families will be negatively impacted by the increased noise, diminished air quality, dangerous traffic and access, and incompatible aesthetics that will rob all neighbors of the quality of life we enjoy today.

The General Plan land use map currently designates the project site as Low-Density 1 (1 to 6 du/acre) while the zoning code designates the project site as R-3-DP (4.22 net acres) and R-1 (0.14 net acre). The proposed project wants a change in these land use designations. As proposed, General Plan Land Use designation will be changed from Low-Density 1 to High Density 4 (22 or more du/acre), while the zoning designation will be changed from R-3-DP and R-1 to R-4-DP. This is an extreme upzoning that is discordant with our existing neighborhood.

2

The density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched development being located adjacent to one another. This project conflicts with the intended density of the General Plan designation for the project site.

3

In 2008 a development of the same height and same density was proposed in this location. Residents requested a reduction of the height and density. The project was also opposed by the Del Rey Neighborhood Council, the Del Rey Homeowners & Neighbors Association and our neighboring LA City Councilmember Bill Rosendahl.

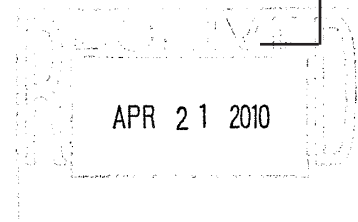
4

I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

5

Sincerely,

Melissa Kutz



April 7, 2010

APR 21 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
Case Nos.: RENV200600147, RCUPT200900150, RZCT200900013, RPAT2009000013

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The General Plan land use map currently designates the project site as Low-Density 1 (1 to 6 du/acre) while the zoning code designates the project site as R-3-DP (4.22 net acres) and R-1 (0.14 net acre). The proposed project wants a change in these land use designations. As proposed, General Plan Land Use designation will be changed from Low-Density 1 to High Density 4 (22 or more du/acre), while the zoning designation will be changed from R-3-DP and R-1 to R-4-DP. This is an extreme upzoning that is discordant with our existing neighborhood.

2

The density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched development being located adjacent to one another. This project conflicts with the intended density of the General Plan designation for the project site.

3

In 2008 a development of the same height and same density was proposed in this location. Residents requested a reduction of the height and density. The project was also opposed by the Del Rey Neighborhood Council, the Del Rey Homeowners & Neighbors Association and our neighboring LA City Councilmember Bill Rosendahl.

4

I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

Sincerely,

Kelly L. Zullo
Ronald L. Zullo
12454 Lucile St.
Los Angeles, CA 90066

5

April 7, 2010

Attention: Anthony Curzi
 Department of Regional Planning
 320 West Temple Street, Room 1348
 Los Angeles, CA 90012

*RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
 Case Nos.: RENV200600147, RCUP200900150, RZCT200900013, RPAT2009000013*

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I am writing to oppose any change of zoning to accommodate the Millennium Playa Del Mar Project. The project proposes to add 216 apartment units (60 feet tall) along with a 433-space parking structure (56 feet tall) in the heart of a neighborhood of single story homes in Del Rey. The General Plan calls for low density in this area. The enormity of this project conflicts with existing land use plans of the General Plan. I am a resident of Del Rey and I believe our families will be negatively impacted by the increased noise, diminished air quality, dangerous traffic and access, and incompatible aesthetics that will rob all neighbors of the quality of life we enjoy today.

2

The General Plan land use map currently designates the project site as Low-Density 1 (1 to 6 du/acre) while the zoning code designates the project site as R-3-DP (4.22 net acres) and R-1 (0.14 net acre). The proposed project wants a change in these land use designations. As proposed, General Plan Land Use designation will be changed from Low-Density 1 to High Density 4 (22 or more du/acre), while the zoning designation will be changed from R-3-DP and R-1 to R-4-DP. This is an extreme upzoning that is discordant with our existing neighborhood.

3

The density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched development being located adjacent to one another. This project conflicts with the intended density of the General Plan designation for the project site.

4

In 2008 a development of the same height and same density was proposed in this location. Residents requested a reduction of the height and density. The project was also opposed by the Del Rey Neighborhood Council, the Del Rey Homeowners & Neighbors Association and our neighboring LA City Councilmember Bill Rosendahl.

5

I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

Sincerely,



APR 21 2010

MAY 11 2010

April 7, 2010

Supervisor Mark Ridley-Thomas *C/O ANTHONY CURZI*
 866 Kenneth Hahn Hall of Administration
 500 W. Temple Street, Los Angeles, CA 90012

*RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
 Case Nos.: RENV200600147, RCUPT200900150, RZCT200900013, RPAT2009000013*

Dear Supervisor Mark Ridley-Thomas,

I am writing to request you oppose any change of zoning to accommodate the Millennium Playa Del Mar Project. The project proposes to add 216 apartment units (60 feet tall) along with a 433-space parking structure (56 feet tall) in the heart of a neighborhood of single story homes in Del Rey. The General Plan calls for low density in this area. The enormity of this project conflicts with existing land use plans of the General Plan. I am a resident of Del Rey and I believe our families will be negatively impacted by the increased noise, diminished air quality, dangerous traffic and access, and incompatible aesthetics that will rob all neighbors of the quality of life we enjoy today.

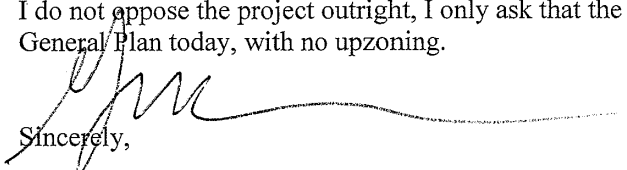
The General Plan land use map currently designates the project site as Low-Density 1 (1 to 6 du/acre) while the zoning code designates the project site as R-3-DP (4.22 net acres) and R-1 (0.14 net acre). The proposed project wants a change in these land use designations. As proposed, General Plan Land Use designation will be changed from Low-Density 1 to High Density 4 (22 or more du/acre), while the zoning designation will be changed from R-3-DP and R-1 to R-4-DP. This is an extreme upzoning that is discordant with our existing neighborhood.

The density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched development being located adjacent to one another. Please help us protect the intended density of the General Plan designation for the project site.

In 2008, before you were elected as County Supervisor, a development of the same height and same density was proposed in this location. Residents requested a reduction of the height and density. The project was also opposed by the Del Rey Neighborhood Council, the Del Rey Homeowners & Neighbors Association and our neighboring LA City Councilmember Bill Rosendahl.

I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

Sincerely,



MAY 11 2010

Comment Letter Nos. 8-35

Please see the list of commenters and comment letters above for the list of individuals that signed the form letter. Each form letter was identical so the responses below are for all comments contained in the form letter (**Comment Letter 8 through 35**).

Comment 8.1

This comment states opposition to the proposed project and believes increased noise, diminished air quality, dangerous traffic and access, and incompatible aesthetics will impact quality of life for area residents. Project and cumulative level construction and operational impacts were analyzed in the Draft EIR for traffic and access (Section 4.5), visual resources (Section 4.6), air quality (Section 4.4) and noise (Section 4.3).

For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

For a detailed response in regards to the general concern about traffic related to the proposed project, please refer to **Topical Response 2: Traffic and Access**.

Aesthetics, light, and glare were all assessed in detail in the originally circulated public Draft EIR in Section 4.6, Visual Resources, and again in the Recirculated Draft EIR. Project and site-specific visual simulations and renderings were prepared for aesthetics impact analysis. Additionally, project and site-specific shade and shadow simulations were prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the existing apartment buildings along Jefferson Boulevard because the structures included in the proposed project would be to the north of the existing structures. This analysis is found subsection 4.6.4.4, Project Analysis (Shade/Shadow). Also, please refer to **Topical Response 3: Project Design and Height**.

Construction and operational air quality impacts anticipated to result from the proposed project were assessed in Section 4.4 Air Quality of the Draft EIR. On page 4.4-65 of the Draft EIR, it is stated that "VOC [Volatile Organic Compounds] emissions would exceed SCAQMD's [South Coast Air Quality Management District's] threshold of significance during 2012; therefore, construction of the proposed project would have a significant impact on air quality." The Draft EIR also analyzed air quality impacts from operation of the proposed project and concludes this impact would be less than significant after implementation of mitigation measures.

Comment 8.2

The comment describes the proposed zone change and General Plan Amendment and states the requests are discordant with the existing neighborhood. For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**. Also, please refer to **Topical Response 3: Project Design and Height**. In sum, the Draft EIR shows that the three multi-family residential buildings to the south of the project site have a combined total of 154 units on 1.55 acres, which is a density of approximately 99 units per acre. The proposed project would have two ranks of density as indicated here in a modified **Figure 4.1-2, Surrounding Residential Density**: 177 units on 3.0 acres on the southern portion of the project site, or 59.0 units per acre, and 19 units on 1.3 acres on the northern portion of the project site, or 14.6 units per acre. The blended site-wide density of the proposed project design is 46.6 units per acre, almost half of the density of the existing multi-family residential uses located directly south of the project site boundaries in the City of Los Angeles. The Draft EIR concluded that the proposed density would be consistent with the density of similar developments in the neighborhood.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 8.3

The comment states that the density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched developments being located adjacent to one another and that the proposed project conflicts with the intended density of the General Plan land use designation for the project site. Section 4.1, Land Use and Planning, of the Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant impact.

For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 8.4

This comment notes that a project was proposed in 2008 at the same location with the same height and density and was opposed by several groups. The commenter does not cite a specific concern regarding

the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 8.5

This comment requests that the proposed project be constructed as allowed under the current General Plan land use designation for the project site. The basic purpose of CEQA and the Draft EIR is to inform decision makers and the public about the potential, significant environmental impacts of the proposed project and identify ways the environmental impacts may be avoided or reduced. The EIR does not serve as a decision-making document.

The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

21 April 2010

TO: Dinerstein Companies

FROM: Matthew Murray

Resident / Adjacent North Boundary to proposed project located at the intersection of Centinela avenue and Jefferson Avenue, in Los Angeles CA 90066.

Subject: Local resident input and HOA representation.

Sir / Ma'am,

This letter has two (2) purposes. One is to provide documented support from local residences adjacent to the proposed development project located at Jefferson and Centinela intersections, in Los Angeles California 90066. Second, is to illustrate the possibility of misrepresentation by local HOA organizations opposed to the project.

My address is identified below. I reside at the North boundary of the project location. If there were an impact or merit scale afforded to residences based on impact, those of us physical abutted to the project boundary would score the maximum. I am supportive of the project based on the following reasoning and thresholds:

- a) The project meets and exceeds all required impact thresholds.
- b) Dinerstein (Josh Vasbinder) has actively engaged the surrounding community with the following mitigation initiatives (none of which are required by law or impact limits):
 - multiple community awareness / disclosure meetings
 - local resident visual impact simulations
 - updated / revised traffic + engineering report data
 - additional traffic lights (none of which are required to be installed)
 - local school landscaping
 - adjacent resident filters / dust screens / relief landscaping
 - continuous open dialogue with local residence (physically/email/phone)
 - revised project scale, class mix and vertical height plans based on input from local HOA organizations.
- c) These type project occur frequently in L.A. County. This specific project is not askew or different from the historical precedence, and it is an inevitable, logical, and legal answer to the growing population of Los Angeles County.
- d) This project does not violate any impact thresholds, nor does it exceed any current environmental limitations imposed by L.A. County. Thus, there is no empirical data to justify blocking the project.
- e) Everyone wants a green pasture adjoining their property. In a perfect world that would be a legitimate desire....but property is scarce in L.A. County, and the population is growing...and there is no specific data or reason to justify denying this project. If there were such a reason, I would be the first to actively pursue an alternate plan.

A local HOA organization has claimed to "represent" the voice of the surrounding residences. There has been no active voting process to make such claims. 390 total HOA members (of which ten are continually active) claiming to represent 30,000 individuals is not only false, but borderline illegal. I have no direct contact with Dinerstein group. I am not affiliated nor have any business dealings with them. My support is strictly based on what is fact, what is required, and whether the impact is within the County guidelines....all else is subjective opinion.

I would love to have a green pasture adjoining my property. That is not reality. There is no reason to block this project from proceeding. If there were, I would support a revision to the plan.

X *Matthew Murray*

Matthew Murray

12426 Beatrice Street, Los Angeles CA 90066

310-306-2067 home / 310-902-9641 cell

murray_m@msn.com

1

Comment Letter No. 36

Matthew Murray
12426 Beatrice Street
Los Angeles, California 90066
Letter Dated April 21, 2010

Comment 36.1

This letter expresses support of the proposed project.

This comment letter will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Re: 12435 West Jefferson Blvd. and the Dinerstein Project

Dear Ms. Kim and Mr. Curzi:

We are writing to express our sincere concerns about the proposed development at 5550 Grosvenor Blvd. in an unincorporated part of the County of Los Angeles as proposed. Our attorney Wayne Avrashow will give you a detailed review of our objections for the record but we also wanted to make a statement for the record to you both on behalf of the 62 families who live in our building and will be greatly impacted by this project. Their health and quality of life is our concern.

1

There are land use / zoning issues with this project if an up zone is granted.

While development is good for jobs and the economic growth of Los Angeles, a development of this size and density in a low-density residential area is out of character for this neighborhood of single family homes to the north and the existing apartment buildings to the south.

2

We do not oppose a development on this parcel. We do oppose a development of the size, density and design that a zone change would allow for. We oppose it because of it's environmental impact on those living in close proximity.

3

This project will tower 20 + feet taller then the three existing apartment buildings on Jefferson Blvd. to the south. This parcel does not front any busy thoroughfares like Jefferson Blvd. or Centinella, yet it will be larger and taller then the apartments on these busier streets.

4

One architect when reviewing this project wrote, " They have designed a massive wall of structure to the south side. The north side of the property is proposed to be built with a graduated structure that will be more architecturally appealing. The south side is proposed with a block wall of structure. The proposed design actually pushes the bulk of the structure toward the south property line to achieve the lessened impact to the north. There is no buffer of green and a narrow alley is little separation. It is highly unusual for a parking structure to be opposite the patios, windows and decks of an apartment complex, yet this proposed design allows for that."

5

To give you a perspective: our property is directly to the south of this development and almost the entire length of their garage is behind the entire length of our building.

6

To the south it will be separated from our property by only a small 28-foot alley. All 3 apartment buildings to the south are configured at R-3 zoning and the tallest is 35 feet high. This project will be out of character to their size, as well, since it is proposed at it's highest points over 55 feet. This is 20 feet higher then any buildings on Jefferson.

7

None of the existing apartment buildings on Jefferson enters or exits on the alley but this project wants total access to this alley for their moving vans, 433 cars and garbage trucks.

8

In summary, Up zone to R-4 for this property will allow 218 units to be built and a 433-above ground car parking garage all interior to any busy streets. This proposed dense complex would enter and exit on to a small narrow alley. This entire project is out of scale for this area and will place an enormous burden on this small alley. While Dinerstein proposes a 3 feet widening which is minimal at best, they do not explain how they will widen the full length of this alley since it is not all part of their purchase agreement.

9

Most importantly, the flawed design because of its density and configuration has our property at 12435 West Jefferson looking **solely** at the 433 open parking structure, at 28 feet from the windows, patios and decks of our apartment units on the back side of our building.

10

30 of our units on the backside of our building face this garage venting fumes into the alley and their patios will now look directly at the open air parking structure. Six side units have bedroom windows that will also look into this garage and all 18 top floor front-facing units with lofts, will have their lofts and decks also facing this parking structure. Therefore, 55 of the 62 units in our building will be directly impacted by the faulty design and extreme density of this project. None of our units have AC, only energy saving ceiling fans. The lack of light, view, air, increased noise and emissions will make leasing these 55 units impossible. because of the hazards to our tenants' health that will be encountered.

11

When visiting a similar complex that is being built by this company with a similar above ground parking garage, no units from their complex or those nearby were forced to look at a similar parking structure. It would be highly

12

unusual to find a parking garage at a 28 ft distance away from the decks, windows and patios of another apartment building.

12

Environmental issues that this project will cause have not been adequately addressed.

Our property will face the open air-parking garage that will have entrance and exit to this small alley creating traffic and traffic noise on this alley from the 433 cars parked there. Air pollution, loss of light, car alarms at all hours of the day and night as well as the noise from moving vans and garbage trucks will affect our tenant's quality of life after construction.

13

During construction this large complex has foundations proposed that require it to be 26-33 feet below mean sea level. As the site is 14-26 feet above sea level, the foundations will need to be approximately 50' below the existing grade. The piles are to be drilled with at BG25 drilling machine. There will likely be a significant noise impact to the surrounding neighborhood from this drilling and especially our units that have no AC to close their windows to the noise and vibrations.

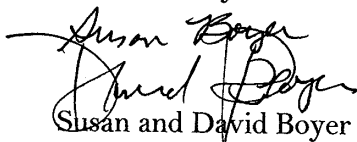
14

They are proposing construction time to be 16-18 months. The first month is proposed for demolition of the existing structure and facility and would require approximately 750 round trip hauling trucks, or an average of about 38 per day. They propose that the subsequent grading will also take about a month, with approximately 9-13 round trip trucks per day. Please note that footnote 4 of section 3.4.3.3 reads 15000 cubic yards / 58 days. That is a tremendous amount of dirt to be moved! The EIR states in TABLE 4.4-13 Estimated Unmitigated Construction Emissions of proposed project would have a SIGNIFICANT impact on air quality. The EIR did not adequately address this issues.

15

We were very disappointed that the planning commission did not find it essential to view this project site from our apartment units. I extend an invitation to you both again in hopes of better illustrating our concerns.

Most sincerely,


Susan and David Boyer

16

Alan and Debby Berg

Alan Berg Debby Berg

Owners of 12435 West Jefferson

16

Comment Letter No. 37

Susan and David Boyer
Alan and Debby Berg
Owners of 12435 West Jefferson Boulevard
Los Angeles, California 90066
Letter Undated

Comment 37.1

This comment expresses general concern about the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required. The comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 37.2

The comment states the proposed project is out of character with the surrounding neighborhood. For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Section 4.1, Land Use and Planning, of the public Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant and unavoidable impact.

Comment 37.3

The comment states opposition to the proposed size, density, and design because of the project's environmental impacts. The commenter provides no substantial evidence that the project's proposed density, size and design would cause a significant and unavoidable impact. Please see response to **Comment 37.2** above.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 37.4

The comment states the project is over 20 feet taller than the three existing apartment buildings on Jefferson Boulevard to the south. The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The proposed project will increase the width of the existing alley from 25 feet to 28 feet to create more distance between the

proposed parking garage and existing Club Marina apartment complex. Further, the height proposed of the parking garage was reduced to a maximum height of 35 feet, which is 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary.

For additional information in regards to this comment, please refer to **Topical Response 3: Project Design and Height**.

Comment 37.5

The comment states the subjective opinion of an anonymous architect regarding the project's design. The commenter does not state a concern or question regarding the adequacy of the Draft EIR.

For additional information in regards to this comment, please refer to **Topical Response 3: Project Design and Height**. No further response is necessary.

Comment 37.6

The comment describes the proximity of their property to the proposed garage.

For additional information in regards to this comment, please refer to **Topical Response 3: Project Design and Height**. No further response is necessary.

Comment 37.7

The comment states the project is out of character with the three apartment buildings to the south since it is 20 feet taller. See response to **Comment 37.4** for a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Comment 37.8

The comment states that the existing buildings on Jefferson Boulevard do not use the alley and that the project will use the alley for moving vans, garage trucks and resident access. Please refer to **Topical Response 2: Traffic and Access** for detailed analysis on existing and future alley conditions.

While some service vehicles such as trash collection trucks may utilize the alley, the purpose for which an alley is designed, moving vans will not use the alley for deliveries because the northern access drive is designed for such activities, including a designated space for moving vans. The alley would be used only for egress by the apartment complex residents. The Draft EIR concluded that the traffic volumes along the alley would be dramatically lower than the current traffic due to the provision of a signal at Grosvenor Boulevard and Jefferson Boulevard.

Comment 37.9

The comment states the project is out of scale for the area and will burden the alley. For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Section 4.1, Land Use and Planning, of the public Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant and unavoidable impact.

For a discussion of traffic and access, please refer to **Topical Response 2: Traffic and Access**.

Comment 37.10

The comment states design is flawed because of the proposed density and because they will face directly at the open parking garage. The garage design has been substantially revised. The 329-space parking garage would have a maximum height of 35 feet and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with facades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural facades to the exterior, the potential for air quality, noise, and aesthetics impacts are avoided through project design features. Please refer to **Topical Response 3: Project Design and Height**.

Comment 37.11

The comment asserts that the proposed density and garage design will cause lack of light, views, air, and increased noise and emissions will be hazardous to their tenant's health and make future leasing of the apartments impossible.

The parking garage would have a maximum height of 35 feet and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with façades that resemble a multi-family residential structure so that it does not appear to be a parking garage. Although the Draft EIR concluded the garage would not create a significant impact, by sealing the proposed parking garage, providing an internal ventilation system, and adding architectural facades to the exterior, air quality, noise, and aesthetics impacts are further reduced through project design features.

Please refer to **Topical Response 3: Project Design and Height** for additional information.

Comment 37.12

The comment states it is unusual that a parking garage would be located 28 feet from another apartment building. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 37.13

The commenter claims there will be traffic and noise impacts on the alley and air pollution, loss of light, car alarms, and noise from moving vans and garbage trucks will affect their tenants. Please refer to response to Comment 37.11.

Comment 37.14

The commenter states there may be a significant noise impact from construction. The potential for noise impacts during project construction were assessed in Section 4.3 Noise of the Draft EIR. For Threshold 2: result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels, the Draft EIR found the proposed project may result in a potentially significant impact. The following mitigation measure was included in the Draft EIR to reduce this potentially significant impact to less than significant levels: “driven pile driving shall be prohibited. The proposed structure shall be supported on auger pressure grouted displacement (APGD) piles only to help minimize the disrupting effects of noise and vibration normally associated with driven piles.” However, the Draft EIR concluded that noise levels for demolition, grading, and excavation would be audible and substantially above the permitted daytime standards of 75 and 80 dB(A) for single- and multi-family residential land uses and schools, as established in the County Noise Ordinance. Construction activities are expected to result in intermittent daytime exceedances of the County noise guidelines for short periods. As sensitive receptors are located adjacent to and in the vicinity of the project site, this intermittent increase in noise would result in a significant impact and would most substantially impact those homes located north of the project site. Mitigation measures suggested by the County will reduce construction noise, but not to levels below County significance thresholds, which will result in a short-term, significant and unavoidable noise impact.

Please refer to page 4.3-17 of the Draft EIR for this noise impact analysis and mitigation measure.

Comment 37.15

The commenter states that the Draft EIR did not adequately address potential air quality impacts from construction of the project. Construction and operational air quality impacts anticipated to result from the proposed project were assessed in Section 4.4 Air Quality of the Draft EIR. On page 4.4-65 of the Draft EIR, it is stated that “VOC [Volatile Organic Compounds] emissions would exceed SCAQMD’s [South

Coast Air Quality Management District's] threshold of significance during 2012; therefore, construction of the proposed project would have a significant impact on air quality." The Draft EIR also analyzed air quality impacts from operation of the proposed project and concludes this impact would be less than significant after implementation of mitigation measures.

Comment 37.16

The commenter invites the Planning Commission to view the project site from their apartment units. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

THE LAW OFFICE OF
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April 28, 2010

Via e-mail & Messenger

Ms. Mi Lee & Mr. Anthony Curzi
Department of Regional Planning
Los Angeles County
320 West Temple Street
Los Angeles, CA 90012

Re: County R2009-02015/Millennium-Playa Del Mar Apartments (the "Project")

Dear Ms. Lee & Mr. Curzi:

This office represents the ownership of the apartment building located at 12435 W. Jefferson Boulevard, commonly known as the Club Marina Apartments (the "**Apartment**"). The EIR for the Project is inadequate for the numerous reasons detailed in this letter.

My client's Apartment has three levels of residents to a maximum height of 35 feet (some have a loft). It is located between two other apartment buildings on Jefferson Blvd., immediately abutting the alleyway and the Project.

The Project proposal of 216 apartments has a maximum height of four stories (58 feet), a 4.5 story, 433-space parking structure with a maximum height of 56 feet, (the "**Garage**"); and seeks discretionary approval of a zone change from R-3-DP and R-1-DP to R-4. This does not correspond nor conform to the existing land uses of single family homes to the north and west, and 2-4 story apartment buildings to the south.

All of the environmental impacts directly arise from the Applicant's poorly designed land plan which crams the desired R-4 zoning and 216 dwelling units, and the 4.5 story Garage onto the site instead of accepting a slightly less, but still reasonable density. The land plan also creates various environmental impacts. Apartment residents will be severely impacted by the Project's adjacent, massive Garage and the 1,433 daily vehicle trips (EIR page 4.5-22) which would be funneled onto either a narrow, existing 25' alleyway (proposed widened to 28'), or a future private driveway that abuts single family residents (collectively the "**Access**").

e:clubmar.county.4.28.10

Page 1 of 9

Inadequate EIR Ignores Environmental Impacts & Omits Reasonable Alternative

a) Environmental impacts of noise, light, increased shadows and decreased air quality, combine to severely impact the adjacent residents of the single family homes, the Apartment and the adjacent apartment buildings. These impacts directly and solely arise from the mass and height of the Garage and the poorly planned Access (this series of impacts are collectively referred to herein as the “**Unmitigated Impacts**”). Numerous Court rulings have confirmed that all of the project’s environmental impacts must be considered, City of Santee v. County of San Diego, 214 Cal. App. 3d 1438 (1989), yet the EIR fails to analyze or mitigate these Unmitigated Impacts.

5

b) The EIR fails to offer sufficient reasoning how the Unmitigated Impacts are not substantial environmental impacts that require mitigation. CEQA requires that reasoning to support a determination of insignificance must be disclosed, (numerous cases, including Protect the Historic Amador Waterways v. Amador Water Agency, 116 Cal. App. 4th 1099 (2004).

6

c) Alternatives presented in an EIR are described as the “core of an EIR,” Citizens of Goleta Valley v. Board of Supervisors, 197 Cal. App. 3d 1167 (1988). The EIR is inadequate since it fails the CEQA mandate to identify feasible alternatives that could avoid or substantially lessen the Project’s significant environmental impacts (CEQA Guidelines §21002, 21002.1(a)). (Note: all references herein to “Guidelines” are to those CEQA Guidelines as incorporated in the California Code of Regulations).

7

d) The Traffic Report analysis was based upon a misleading “net” amount of vehicle traffic. The property’s existing use is a Church with almost all of their traffic occurring on the weekend. While the current traffic has ingress and egress at an existing Church driveway, the Project’s proposed access is through a private driveway adjacent to single family residences, and a second access through an alleyway abutting more than 300 apartment residents.

8

Project Objectives are Conclusionary and Based Upon Non-Relevant Information

In several instances the EIR cites numerous conclusions but omits critical facts and the required analysis. These conclusionary remarks violate CEQA, that an EIR must contain facts and analysis, not just bare conclusions and/or opinions, Citizens of Goleta Valley v. Board of Supervisors, 197 Cal. App. 3d 1167 (1988).

9

Project Objectives–Unmet Housing Need

Project Objectives justify the Project by proclaiming there is a, “significant unmet demand for housing,” and the area is a, “geographic zone with defined housing need.” (3.0-2). These opinions are not verified by any specific data, but merely rely on broad brushed, general language in the County-wide General Plan.

10

Recent, current and objective economic data prove the falsity of the Project

Objectives. The University of Southern California Marshall School of Business recently published the "Casden Real Estate Economics Forecast, Southern California Multi-family 2010 Report." This report was quoted in the Los Angeles Times article of April 8, 2010, "Southern California Apartment Rents Are Expected to Keep Falling." The Times quoted the USC Report as detailing the, "high number of foreclosures and rampant overbuilding during the housing bubble has resulted in a glut of rentals as demand has slackened."

10

Located 2.2 miles away, within the same sub-housing market is Playa Vista. This development received recent approval for 2,800 housing units (stated in EIR as 2,600 dwelling units 4.5-17), adding to its previous approved 3,246 housing units (4.5-17). The Project Objectives supporting an intense land use, dramatic height increase and significant environmental impacts adjacent to lower density uses is contradicted by the area's glut of housing which will be exacerbated by Playa Vista's 5,846 housing units, the existing housing unit vacancies, and the numerous approved and planned housing developments.

11

This housing statistical data may not be relevant in many environmental impact reports, however this EIR extensively relied upon and seeks justification for the Project, by quoting generalities from the County's General Plan. The Project Objectives that there is an, "unmet demand" for housing, and that this, "geographic zone has a defined housing need" is contrary to third party expert studies.

12

Project Objectives–Misleading Avoidance of Environmental Impacts

Another Project Objective is to, "avoid unnecessary environmental impacts associated with grading and excavation by building structures above the level grade to the extent feasible." This Objective is misleading. The construction of the Garage immediately adjacent to the 3 story Apartment and the apartments will create long term Unmitigated Impacts and not avoid such. However these impacts could be avoided by the land use plan addressed in the Reasonable Alternative, page 4 herein.

13

Project Objectives–R-4 & 58' Height Not Compatible with Single Family and R-3 Uses

Another stated Project Objective is to construct, "high quality multi-family housing at a density, physical scale...that is compatible with and complimentary to adjacent uses in the surrounding neighborhood." The Project has numerous elements that are not compatible nor complimentary, including; R-4 zoning in between R-1 and R-3 zoning at a maximum height of 58' and 4 stories, a 4.5 story Garage adjacent to residents, and two Access points of an alleyway and private driveway immediately adjacent to existing residential uses.

14

One Project Objective seeks to justify the Project by providing, "a height transition between the single family homes northwest of the project site and the multi family homes to the southeast." The Garage is not a transition, but is a harsh, immense, commercially appearing structure adjacent to residential uses. Its mass and location create severe environmental impacts to its residential neighbors.

15

EIR Omits a Feasible and Reasonable Alternative–The “Reasonable Alternative”

The number and description of the Alternatives are based in part on the disingenuous Project Objectives. The Alternatives fail to comply with CEQA Guidelines which require, “a range of reasonable alternatives to the Project...which would feasibly attain most of the basic objectives of Project that would avoid or substantially lessen any of the significant affects of the Project” (Guideline §15126.6).

16

The Alternatives address the environmental impacts during construction (6.0-2) however fail to state or analyze the long-term environmental impacts that arise from the Unmitigated Impacts.

17

Alternative 2

Constructing 26 single-family detached homes on 4.9 gross acres of R-3 zoned property does not meet the CEQA test of being economically feasible and accordingly should not have been included in the EIR.

18

Notwithstanding the reasons for its exclusion, the EIR deceptively seeks to justify the Project by stating that 26 single-family homes will only “incrementally reduce” the number of vehicle trips compared to the 216 dwelling unit apartment building. Alternative 2 also states that the construction noise impact would be similar to that arising from the proposed Project. This statement strains credibility, the Alternative’s 26 single family homes would certainly result in a greater reduction of vehicle trips than merely “incremental.”

19

The EIR states this Alternative would “not substantially reduce” the significant construction-related noise and air quality impacts “ (6.0-7). However since this Alternative would not include the Garage, this Alternative would “substantially reduce” the long-term significant noise and air quality impacts.

20

Alternative 3

Due to the omission of a site plan or details as to the parking design and location of ingress/egress, the lead agency should require further analysis of this Alternative. Alternative 3 claims to generate 835 additional vehicle trips instead of the Projects 1,078 “net” daily trips (6.0-9). This is a significant reduction and should be further analyzed.

21

Alternative 4

This Alternative of a six-story building is prima facie not feasible for many reasons, the height restriction of the property, the resulting increase in environment impacts and the greater cost of construction. The inclusion of such appears as another diversion from feasible and reasonable alternatives that are omitted. This Alternative should have never been included.

22

Notwithstanding the above, since all Alternatives must be “feasible,” Alternative

23

4's underground parking (6.0-10) confirms subterranean parking is feasible for the Project. The immediately adjacent apartments on Jefferson Boulevard have underground parking; 12505 Jefferson has one and one-half levels of subterranean parking, the Apartment at 12435 Jefferson has one subterranean level and to the east at 12427 Jefferson has one-half level of subterranean parking. To mitigate or avoid the long term Unmitigated Impacts, the Project should consider extending the public street Juniette, utilize on-grade parking, and some subterranean parking.

23

The Omitted Reasonable Alternative

CEQA guidelines require a "rule of reason" when discussing which Alternatives are necessary to permit the reasoned choice (Guideline § 15126.6 f). The Alternatives fail the basic CEQA test of proposing alternatives designed to minimize a project's environmental impacts, cited in innumerable cases, including, Citizens of Goleta Valley v. Board of Supervisors, 197 Cal. App. 3d 1167 (1988), Laurel Heights Improvement Association v. Regents of University of California, 47 Cal. App. 3d 376 (1988) et. al.

24

The EIR omits the most reasonable Alternative, one with a greater density than the 26 single-family homes of Alternative 2, but less than the proposed 216 units. This Alternative would include a zone of R-3 for the entire project, a height limit of 35', and the requested plan approval to High Density 3. That Alternative would include either on-grade parking or two parking structures with some amount of underground parking spaces (the "Reasonable Alternative").

25

The Reasonable Alternative would also reconfigure the land plan to avoid having 1,433 daily vehicle trips transverse past single family homes and apartment residents. That land plan would extend the existing public Juniette Street as a primary point of access. Juniette is a wider access than either of the two Project proposed access points. A Juniette primary access and elimination of the Garage would avoid the Unmitigated Impacts. CEQA mitigation measures include avoiding an impact by not taking a certain action (Guidelines §15370). This Alternative would strike the proper balance between economic growth and environmental protection.

26

EIR Fails to Analyze Long Term Impacts of Noise, Air Quality and Light

An EIR must not only identify and describe the project's significant short-term, direct environmental effects, but must include the indirect and long-term effects, (Guidelines §15126.2(a)). (emphasis added).

27

Noise

The noise levels during construction are termed, "significant and unavoidable during project construction" (2.0-11). The EIR failed to study or project the level of decibel readings to the adjacent neighbors from the construction of the massive Garage. This must be addressed and if deemed significant, mitigation measures proposed.

28

The EIR accurately cites Appendix G of the CEQA Guidelines, (4.3-14), that a project would have a significant noise impact if it would, "result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project."

29

There were no studies or decibel readings to calculate long-term, permanent noise generated by the Project to its immediate neighbors, the single family homes to the north and east, and the approximately 300 total apartment residents to the south.

30

To address the noise to the single family residents to the north, a mitigation of a "a 6-foot block wall is proposed along the property line to the north of the access alley." Yet without a study of noise generated, there is no method to assess if the 6' wall is adequate mitigation. A mitigation measure must minimize the adverse impact (Guidelines §15126.4(a) (1). The EIR's statement that such "impacts would be less than significant" is conclusionary, without foundation, and must be deemed inadequate.

31

The proposed Garage will accommodate 1,433 daily vehicle trips. The EIR concedes of a, "substantial permanent increase in ambient noise levels" to the single family homes and the Apartments" (4.3-19). The EIR describes that the noise generated by the parking structure will include, "tires squealing, car alarm sounding, car stereos and horns honking," (4.3-19). Yet there were no studies to specifically assess the Garage's noise impacts to approximately 300 adjacent apartment residents, and address mitigation measures. The Apartment residents cannot close their windows to shutter this din since the building relies on ocean breezes and does not have air conditioning.

32

Without facts or studies as justification, the EIR offers the conclusionary statement that the "proposed parking structure is not anticipated to introduce a substantial permanent noise source that exceeds County Standards." (4.3-20). County Standards are not the CEQA test for environmental impacts.

33

Traffic & Access

The Traffic Study of December, 2009 deceptively relied upon two faulty premises affecting the location of the access and the amount of vehicle trips generated by the Project.

34

The present use of the property is a Church. The present traffic has ingress and egress to the Church at an existing Church driveway, a different location than the Project's proposed access of the existing alleyway and future private driveway adjacent to the single family homes. Obviously the Church's main traffic volumes are on the weekends, not a.m. or p.m. peak weekday hours.

35

The premise of the Traffic Study is that there will be 1,078 net daily trips (page 26 of the Traffic Study). However nearly all of the current Church traffic occurs on weekends, so the projected 1,433 daily vehicle trips should be the amount analyzed,

36

not the 1,078 increased generation trips.

36

For the abutting neighbors, the 1,433 daily trips is the true and accurate amount of vehicle trips arising from the Project. Accordingly, the Traffic Study needs to be amended to analyze the 1,433 daily vehicle trips that will be squeezed into an alleyway and a private driveway.

37

The EIR accurately cited Appendix G of the CEQA Guidelines, (4.5-11), that a project has a significant traffic and access impacts if it would, "cause an increase in traffic which is substantial in relation to the exiting traffic load and capacity of the street system" (emphasis added). In the instant matter, one of the two portions of the "street system" is but an alleyway, not a public street.

38

Air Quality

The EIR notes that, "motor vehicles are the primary sources of pollutants within the project vicinity (4.4.-24 and 4.4-71). The 108 page "Air Quality" section of the EIR addresses such important impacts as; Regional Climate, Local Climate, Pollutants, Global Climate Change, Greenhouse Gases, the air quality impacts on the South Coast Air Basin, including nine counties from San Diego County, to Imperial County, San Bernardino County and Santa Barbara County (Figure 4.4-1).

39

Despite this lengthy review, the EIR omits to analyze air quality impacts from those motor vehicles on the adjacent single family homes and apartments. (4.4). While we applaud the County for mandating all multi-family developments receive a LEED Certification, that Certification rings hollow when the Unmitigated Impacts damage the adjacent residents.

40

Visual Resources

The EIR omits to fully analyze the visual impacts of the 4.5 story Garage upon the adjacent single family homes and approximately 300 total residents in the three apartment buildings to the south.

41

The EIR offers two mitigation measures for visual impacts. The first is a "green screen" (4.6-17), further described as a, "wire screen with vines," (4.6-17). This is a ludicrous and inadequate mitigation measure for a 4.5 story Garage looming over adjacent residents. The EIR adds that a row of tall, planted trees, that, "when mature, would provide additional screening," is too vague and speculative as an adequate mitigation for the imposing Garage.

42

Without studies or analysis, the EIR offers that, "shade impacts associated with the proposed project are not considered significant" (4.6-21). This conclusionary view is apparently supported by a series of small, 2" x 3" computer generated renderings (4.6-9a). These renderings fail to detail a visual perspective from any of the single family homes or any of the residences in the multi story apartments.

43

Recycled Land Plan Creates Severe & Unmitigated Environmental Impacts

My clients support a zone change of the property to R-3 and its corresponding height limit, such would be compatible with the General Plan designation. The EIR's inadequacy and the poor land planning do not justify a zone change to R-4 and 216 dwelling units.

44

The land plan is a recycled plan, nearly identical to one proposed by another development entity years ago which was rejected (see Geo-technical Report prepared for the same firm). This is not inherently wrong, but since the earlier site plan was rejected, the recycled plan indicates a lack of response to legitimate community concerns which were expressed years ago and have been raised anew.

45

The land plan is far more intense than typical R-3 and R-4 zoning. In an effort to compensate for the adjacent single family homes, the southern and majority portion of the property is left with an extremely dense 64.7 units/acre and deposits the Garage in immediate proximity to the apartment's residents. (Figure 4.1-2).

46

The EIR's inadequate assessment of the environmental impacts arise from the land use configuration which does not include the components of the Reasonable Alternative. Due to the Centinela Avenue on and off ramps for the 90 Freeway, many, if not most of the Project's future residents will access the alleyway just south of Juniette since that is the nearest to the freeway point of access. The extension of the existing public Juliette Street would avoid channeling 1,433 daily vehicle trips into a 28' wide alleyway and a driveway adjacent to single family homes.

47

Inadequate EIR Requires Recirculating

Public Resources Code §21092.1 requires circulation of the EIR if there is "significant" new information. The information presented herein is significant and has not been addressed in the EIR and the Traffic Study does not accurately analyze the traffic impacts.

48

The herein described Reasonable Alternative and corresponding land plan would reconfigure the Access to lessen the impacts on the single family and apartment residents. This Alternative does not alter the basic nature of the Project, it is economically feasible, has greater density than the 26 dwelling units of Alternative 2, avoids the Unmitigated Impacts with either on-grade parking, or two well designed parking structures to lessen the visual impact and may include subterranean parking. The EIR should explain the basis for excluding this feasible and obvious alternative (Guideline §15126.6(c)).

49

CEQA requires an explanation of how the alternatives were selected, and also an identification of any alternatives that were rejected as infeasible with an explanation as to the reasons they were rejected (Guideline §15126.6(c)).

50

The EIR must provide decision makers with sufficient information to “intelligently take account of environmental consequences,” (Guideline §15151). The failure of the Traffic Report to assess the accurate total number of vehicle trips and the location change of the trips to abut residents, the inaccurate Project Objectives and the lack of analysis of the Unmitigated Impacts combine to provide an inadequate level of information.

51

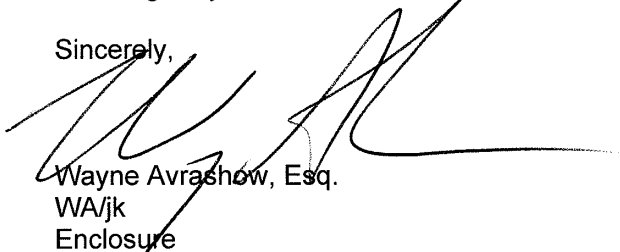
Examples of when a recirculation is required are incorporated in Guideline §15088.5(a). The two relevant examples for the instant matter are: (i) “When new information shows a substantial increase in the severity of an environmental impact.” In this EIR the long-term Unmitigated Impacts and the inaccurate Traffic Study are, “severe environmental impacts.” The second example is (ii) when new information, “shows a feasible alternative or mitigation measure, considerably different from those considered in the EIR,” that would lessen the environmental impacts of the Project. The Reasonable Alternative is the feasible alternative.

52

The lead agency should make a, “good faith effort to find and disclose all that it reasonably can,” Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova 40 Cal 4th, 412 (2007). Only an amended Traffic Study and re-circulated EIR that addresses the points raised herein would disclose all relevant information.

We respectfully thank the Commissioners and the Department of Regional Planning for your attention to this matter.

Sincerely,



Wayne Avrashow, Esq.
WA/jk
Enclosure

53

cc: Clients
Los Angeles County Supervisor Mark-Ridley Thomas, Attn: Ms. Karly Katona
Los Angeles City Councilman Bill Rosendahl, Attn: Ms. Nancy Franco

latimes.com

REAL ESTATE

Southern California apartment rents are expected to keep falling

A study shows the average cost dropping as much as 3.5% in L.A. County this year, 2.4% in Orange County and less than 1% in San Bernardino and Riverside counties but inching up in San Diego County.

By Alejandro Lazo

April 8, 2010

Apartment rents are expected to fall as much as 3.5% in Los Angeles County this year, according to a study released Wednesday, as landlords compete for tenants in a market battered by stubborn joblessness and saturated with freshly constructed housing units.

For apartment dwellers, falling rents have been the housing bust's thin silver lining: During the boom, rents had climbed in tandem with housing prices.

Southern California's high number of foreclosures and the rampant overbuilding during the housing bubble has resulted in a glut of rentals as demand has slackened with high unemployment, according to the Casden Real Estate Economics Forecast.

Meantime, many struggling young adults have moved back in with their parents, and older people who have lost their homes have started living with relatives, according to a separate study for the Mortgage Bankers Assn.

That study -- by Gary Painter, a professor in USC's School of Policy, Planning and Development -- found that a net 1.2 million American households disappeared from 2005 to 2008.

While rents are likely to fall 3.5% in Los Angeles County and 2.4% in Orange County, those declines are expected to be more moderate than in 2009. Rents should fall less than 1% in Riverside and San Bernardino counties but inch up less than 1% in San Diego County, according to the Lusk Center study.

"The take-away is that the economy is showing some small signs of improvement. All markets are going to perform better than the previous year, but for some that still means a decline," said Tracey Seslen, a professor at the USC Lusk Center for Real Estate who co-wrote the Casden study. "L.A. is going to

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54

perform the worst."

In Los Angeles County, the average monthly rent fell to \$1,488 at the end of 2009, a 5.8% decline from a year earlier.

More than 5,700 apartment units were completed in the county in 2009, about 42% of the new supply for the region last year. This year, 4,805 units are scheduled to be built, representing more than half of new construction in Southern California.

Property owners are feeling the pinch.

"It is a way more competitive marketplace now, where before at the high end you could still rent an apartment quickly," said Mark Howell, who owns the historic La Fontaine building in West Hollywood as well as several smaller rental properties in West Hollywood and Beachwood Canyon.

"You really have to sit on that apartment to get that tenant, so you will often wait two or three months to get what the apartment is worth. You really have to lower the rents," he said.

Howell estimates the income from his buildings has fallen 2% to 3% since 2007. While rents at La Fontaine and other high-end properties have held up, he said he has had to lower his price on units in another building, to \$2,200 from \$2,500 for a two-bedroom apartment, for example, or to \$1,550 from \$1,700 for a one-bedroom. His portfolio hasn't declined more because he has brought other units up to market value as tenants have left, he said. Nevertheless, 2009 was intimidating, he said.

54

"Everywhere you would go in West Hollywood you would see a 'for rent' sign," he said. "It was scary."

The average Orange County apartment rented for \$1,464 in 2009, a 4.4% decline from 2008, as the fallout from the subprime mortgage crisis took its toll.

Jessica Nicole Filicko, 30, said she was renting a condominium in Fullerton last year for \$1,100 a month when it was foreclosed on by the lender. While the experience was stressful, she said, the lender ultimately paid her \$3,500 to vacate the property, and she found a comparable unit in the same complex for \$995.

"It definitely is a noticeable change," she said. "I do see a little bit more of my income, and I don't have to live paycheck to paycheck. If something were to happen, there is that cushion, which is a little less stressful."

The average rent in the Inland Empire -- San Bernardino and Riverside counties -- fell 3.8% to \$1,024 in 2009 from the year before.

Seslen of USC said that, while investors have poured money into the region snapping up foreclosed properties, they are not putting many on the market as rentals but are rather holding on to them.

"Their holding costs are relatively small compared to your average Joe," she said. "So they may find that it is worthwhile to keep the home unrented until they decide the time is right to resell."

San Diego County's average monthly rent had the smallest decline in the region, 1.3% to \$1,323 at the end of 2009 compared with a year earlier.

alejandro.lazo

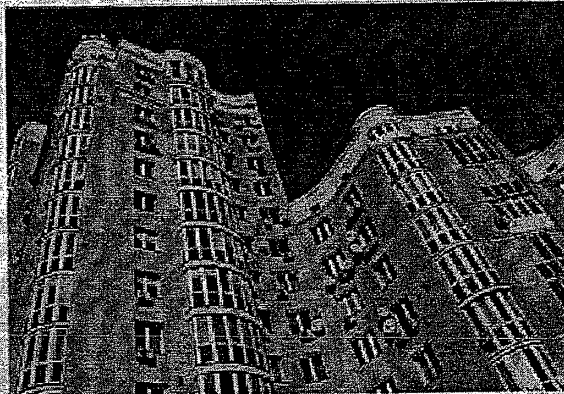
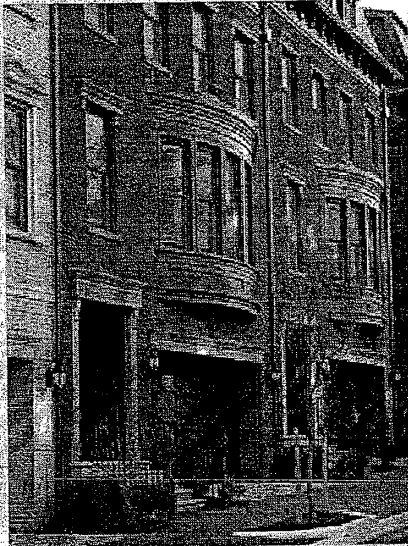
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Times staff writer E. Scott Reckard contributed to this report.

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Southern California **Multifamily** **2010 Report**



Marshall School of Business | School of Policy, Planning, and Development



Comment Letter No. 38

Wayne Avrashow
16133 Ventura Boulevard, Suite 920
Encino, California 91436
Letter dated April 28, 2010

Comment 38.1

This comment states they represent the Club Marina Apartments adjacent to the south of the project site. No further response is required.

Comment 38.2

The comment provides location and height of the Club Marina Apartments. The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required

Comment 38.3

The comment describes the proposed project and that the project does not conform to the land uses adjacent to the project site. For detailed analysis of land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Comment 38.4

These comments states that Club Marina residents will be impacted by the project's adjacent garage, by the number of vehicle trips generated by the project that would use the existing alley and that project proposes too much density for the site. In response to the issues raised in this comment regarding project description, land use and density, please refer to **Topical Response 1: Density and Land Use Compatibility**.

In response to issues raised in this comment regarding traffic and access, please refer to **Topical Response 2: Traffic and Access**. Please refer to **Topical Response 3: Project Design and Height**, regarding the garage design.

Comment 38.5

The commenter claims that the Draft EIR failed to consider noise, light, shadow, and air quality impacts that occur from the mass and height of the garage and the proposed access. The commenter provides no substantial evidence that the garage height and mass and proposed access would create significant noise, light, shadow, or air quality impacts.

To the contrary, the Draft EIR extensively analyzed construction and operation of the proposed project in regards to noise, aesthetics, light and glare, shade and shadow, and air quality.

Section 4.3, Noise of the Draft EIR analyzed potential noise impacts of the project, which includes the garage, and access. Noise level monitoring was conducted by Impact Sciences, Inc. using a Larson Davis 820 Type 2 Sound Level Meter, a meter, which satisfies the American National Standards Institute (ANSI) for general environmental noise measurement instrumentation. The nearest noise sensitive receptors identified in the Draft EIR consist of single-family residences located directly north of the site, multi-family residential apartment south of the site and three single-family residences on Juniette Street next to the property's southeast corner. The Draft EIR concludes that the greatest potential increase in noise is from the increase in vehicle trips generated by the proposed project. Table 4.3-7 of the Draft EIR, Operational Noise On-Site Impacts, shows that the project would contribute traffic volumes that would increase noise levels from 0.0 dB(A) to 0.7 dB(A) along studied roadways segments. This increase is not generally perceptible to most individuals and the operational noise levels are close to the applied standard (see Table 4.3-4). Therefore, impacts are not considered significant given County noise assessment methodologies and current assessment standards.

The Draft EIR also concluded that noise generated by vehicles traveling on the alleyways along the northern and southern boundaries of the project site could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively.

Access to the proposed leasing office and associated surface parking lot would be provided by a 28-foot alley along the northern boundary of the project site. An 8-foot-tall block wall is proposed along the property line to the north of the access alley. Immediately north of the proposed block wall are single-family residences. Vehicles traveling along the alleyway are generally not expected to exceed a speed of 15 miles per hour (mph) based on the length and width of the alley and because vehicles would slow to access the small surface parking lot near the leasing office. The proposed project analyzed in the Draft EIR would result in 1,078 daily vehicle trips. The number of vehicles traveling along the northern project site boundary would represent a fraction of the overall project-generated trips because the alley would generally be used to access to the leasing office and primary access to the project site would be provided via the access alleyway proposed along the southern boundary of the project site. Therefore, vehicles

traveling along the northern alley are not expected to result in a substantial permanent noise source. It is useful to consider the volume of noise which could be generated by all 1,078 project-generated trips traveling along a similar roadway at 15 mph. Model inputs included a roadway width of 28 feet, speed of 15 mph and a distance of 8 feet to the receptor, or the adjacent single-family residences. The proposed 8-foot-tall block wall was not included in the model input. Model results indicate that a noise level of 57.4 dB(A) CNEL could be expected at the adjacent residential land use if all 1,078 project-generated trips were to travel along the alley. As stated previously, solid walls may reduce noise levels by 5 to 10 dB(A). When considering the proposed 8-foot block wall, the noise level would range from 47.4 to 52.4 dB(A) CNEL. As noise generated by vehicles would be lower than this range, the proposed project would not result in a substantial permanent increase in ambient noise at the adjacent single-family residences. Impacts would be less than significant.

The existing alley that runs along the southern boundary of the project site would be widened from 25 to 28 feet and provide access to the proposed parking structure within the southern portion of the project site. Immediately south of the alley are multi-family residences. The residential units within the adjacent multi-family residential buildings are elevated approximately 10 feet above on-site parking garages. Vehicles traveling along the alleyway are generally not expected to exceed a speed of 15 miles per hour (mph) based on the length and width of the alley and because vehicles would slow to access the parking structure. As discussed in Section 4.5, Traffic and Access, of this draft EIR, the proposed project would result in 1,078 daily vehicle trips. As described above, the noise associated with all project-generated trips along a 28-foot-wide roadway at a distance of 8 feet would be 57.4 dB(A) CNEL. As shown in Table 4.3-4, the existing noise levels within the southern portion of the project site currently exceed 57.4 dB(A) CNEL and the County of Los Angeles standard. Noise levels at the existing multi-family residences would be very similar to those on the project site because stationary and mobile noise sources are the same for both. Therefore, based on the above analysis, the proposed project would not result in a substantial permanent increase in ambient noise at the adjacent multi-family residences. Impacts would be less than significant.

Noise generated within the proposed parking structure would include tires squealing, car alarms sounding, car stereos and horns honking. These sources could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively. An analysis of potentially significant impacts is provided below. The parking structure as proposed in the Draft EIR would be partially enclosed with rectangular openings around the perimeter of each level. Multi-family residences located adjacent to the south of the project site would be approximately 37 feet south of the parking structure after project construction. While the partially enclosed structure would act as a barrier, noise generated by vehicles traveling within the parking structure such as tires squealing, car alarms sounding, car stereos and horns honking would pass through the rectangular openings around the

perimeter of the structure. These sources of noise may be audible at the northernmost residential units within the adjacent multi-family complexes and may result in temporary annoyances. However, this noise would be temporary and periodic and occur most intensely during the AM and PM peak periods when project residents are leaving or returning from work. Further, the proposed parking structure is not anticipated to introduce a substantial permanent noise source that would exceed defined County Standards in the ambient noise level. Therefore, impacts would be less than significant.

In addition, the garage has been reduced to a maximum height of 35 feet to accommodate a reduced 329 parking spaces and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with façades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural façades to the exterior, air quality, noise, and aesthetics impacts are further reduced to a level of insignificance through project design features. As with the garage designed and analyzed in the Draft EIR, the revised garage would not create a significant impact.

Aesthetics, light, and glare were all assessed in details in the Draft EIR in Section 4.6, Visual Resources. Project and site-specific visual simulations were prepared for impact analysis. Additionally, shade and shadow simulations were prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the apartment buildings along Jefferson Boulevard because the proposed new building will be to the north of the existing structures. This analysis is found subsection 4.6.4.4 Project Analysis (Shade/Shadow).

Construction and operational air quality impacts anticipated to result from the proposed project were assessed in Section 4.4 Air Quality of the Draft EIR. On page 4.4-65 of the Draft EIR, it is stated that “VOC [Volatile Organic Compounds] emissions would exceed SCAQMD’s [South Coast Air Quality Management District’s] threshold of significance during 2012; therefore, construction of the proposed project would have a significant impact on air quality.” Table 4.4-15, Estimated Unmitigated Operational Emissions indicates that the project impacts will not exceed the established thresholds.

Comment 38.6

The commenter asserts the Draft EIR fails to provide sufficient analysis from the impacts described in **Comment 38.5** for noise, light, shadow, and air quality impacts that occur from the mass and height of the garage and the proposed access. The commenter provides no substantial evidence to substantiate these claims. To the contrary, the Draft EIR fully analyzed the project’s potential light, shadow, and air quality impacts.

Please refer to response to **Comment 38.5** above for a complete discussion.

The only impact identified in the Draft EIR that could not be reduced to less than significant levels with incorporation of mitigation is construction air quality impact related to SCAQMD thresholds. The Draft EIR discloses this clearly on page 4.4-65.

Therefore, this comment is inaccurate and does warrant further response.

Comment 38.7

The commenter asserts the EIR is inadequate because it fails to identify feasible alternatives that could avoid or substantially lessen the project's significant environmental impacts. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the project alternatives in the Draft EIR are not adequate. The Draft EIR did analyze feasible alternatives that could avoid or substantially lessen the project's significant environmental.

Alternative 1: No Project, would eliminate the significant construction air quality and construction noise impacts caused by the proposed project and the significant project and cumulative impacts on the solid waste environment would be reduced but not eliminated as part of the No Project Alternative. would be exceeded.

Alternative 2: Residential Buildout as Allowed Under General Plan would result in reductions in project impact potential but would not substantially reduce the significant, construction-related noise and air quality impacts that are associated with the proposed project.

Alternative 3: Three-Story Residential Development over One-Level of Ground Level Parking would incrementally but not substantially reduce construction-related noise impacts, which would remain significant. Primarily due to a reduction in vehicle trips and a reduction in the intensity of land uses proposed as part of Alternative 3, operational noise would be incrementally reduced. Short-term air quality impacts during construction under Alternative 3 would be reduced, but would not be substantially reduced or avoided. Due to the reduced building intensity, impacts associated with the traffic, sewer, solid waste and visual resources environment would be incrementally reduced, or be nearly the same, but would not differ substantially with the proposed project.

Alternative 4: Private Open Space/Taller Building over Underground Parking would result in one new unavoidable significant impact. The increased height of structures proposed as part of Alternative 4 would be substantially taller than other structures occurring in the project area and would stand out in sharp contrast to the existing landscape. The structure proposed as part of Alternative 4 structure would differ substantially from existing code requirements. Although the alternative would concentrate

development in a small area and would provide some park space, this benefit is out weighed by impacts associated with the additional grading requirement and a structure height that is out of character with the surrounding area.

Comment 38.8

The commenter asserts that the traffic analysis is flawed based on a misleading amount of “net” vehicle traffic because the Church trips occur mostly on weekends. Please refer to **Topical Response 2: Traffic and Access** for a direct response of determination of existing trips on the project site. The traffic study that assessed potential impacts of the proposed project was prepared in consultation with the City of Los Angeles Department of Transportation (LADOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). This consultation and approval included substantive review and agreement with existing conditions, trip credit, trip generation, trip distribution, future conditions, related projects, cumulative impacts, etc. assumptions used by RAJU Associates, Inc to conduct the analysis.

Comment 38.9

The project objectives identified by the project applicant in the project description of the Draft EIR are described by the commenter as “conclusionary and based upon non-relevant information.” The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the project objectives in the Draft EIR are not adequate. The project objectives were identified by the project applicant and accepted by the County of Los Angeles Department of Regional Planning. California Administrative Code Title 14, *State CEQA Guidelines* Section 15124 Project Description states:

(b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

As described by *State CEQA Guidelines* Section 15124, adequate project objectives were included in the Draft EIR.

Comment 38.10

The commenter states the claim that the project’s objective to provide needed housing is refuted by “third party expert studies” that do not find that there is a shortage of housing in Los Angeles County, or that there is a need for multi-family residential housing in Los Angeles County. The commenter’s third party expert studies are a regional housing forecast and newspaper article regarding falling rents for the entire

Southern California region as evidence that there is not a need for multi-family housing within the unincorporated area of Los Angeles County as identified in the County's long range General Plan. The primary purpose of the County's General Plan Housing Element is the provision of decent, safe, sanitary, and affordable housing for current and future residents of the unincorporated areas of Los Angeles County. Although the studies cited by the commenter highlight current housing conditions for Southern California in general, the Housing Element focuses on meeting housing needs both now in the future to keep pace with the County's expected rate of population growth. The proposed project would provide much needed multi-family housing and would assist the County with meeting its long-term housing needs outlined in the General Plan.

As described by *State CEQA Guidelines* Section 15124, project objectives were included in the Draft EIR.

Comment 38.11

The commenter references the Playa Vista development in the City of Los Angeles as evidence that there is an oversupply of housing and therefore the project objectives are inadequate. Please refer to responses to **Comments 38.9** and **38.10** above.

Comment 38.12

The commenter states the EIR extensively relied upon and seeks justification for the project by using generalities from the General Plan. Please refer to responses to **Comments 38.9** and **38.10** above.

The primary purpose of CEQA, in short, is to inform decision makers and the public about the potential impacts of a proposed project and identify ways that impacts can be avoided or reduced and not to provide justification to approve a proposed project. The Draft EIR does not provide justification to approve or disapprove a proposed project. Through preparation of a Draft EIR, the County and the project applicant are meeting the requirements of CEQA. The project's consistency/inconsistency with applicable plans, policies, and regulations is only relevant to CEQA in that the project's consistency/inconsistency with applicable plans, policies, and regulations is disclosed. Such disclosure is included in Section 4.1, Land Use and Planning, in the Draft EIR.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 38.13

The commenter states the project objective to “avoid unnecessary environmental impacts associated with grading and excavation by building structures above the level grade to the extent feasible” is misleading because the garage will create long term unmitigated impacts. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the garage will create a significant impact. To the contrary, the reasonably foreseeable environmental impacts associated with garage and project is fully discussed in the aesthetics, shade/shadow, and land use impact sections of the Draft EIR.

Please refer to responses to **Comments 38.5**.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 38.14

The commenter asserts that the project objective to construct high quality multi-family housing that is compatibility and complimentary to adjacent uses in the surrounding neighborhood is not met by the proposed project. Please refer to **Topical Response 1: Density and Land Use Compatibility**.

Please also refer to responses to **Comments 38.9** and **38.10** above.

Comment 38.15

The commenter claims project objective to provide a height transition between the single-family homes northwest of the project site and the multi-family homes to the southeast is not met because the garage will create environmental impacts on adjacent neighbors. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the garage will create an unavoidable significant impact. Please refer to **Topical Response 1: Density and Land Use Compatibility**.

The project is designed to ensure the project’s physical compatibility with surrounding uses. The project proposes with open space and two-story carriage units along the northerly side of the project site and provides a similar height transition from the single-story single-family homes located just northerly of the subject property. Along the northern boundary, the primary residential building would be set back a minimum of approximately 35 feet and a maximum of about 43 feet from the northern site boundary. The two-story perimeter structures would not exceed 28 feet in exterior height (excluding chimney heights) along the northern project margin, compared to 31 feet for the Draft EIR project. At the northwest corner

of the project site, a three-story portion of the building would reach a height of 39.5 feet. At approximately 80 feet from the northern property line, the building would transition to a height of four stories, or about 49 feet, exclusive of architectural projections (see **Figure 3.0-9**). The height of the parking structure has been reduced from 56 feet to approximately 35 feet.

The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The proposed project will increase the width of the existing alley from 25 feet to 28 feet to create more distance between the proposed parking garage and existing Club Marina apartment complex. Further, the proposed parking garage will have a maximum height of 35 feet, which is 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary.

Comment 38.16

The commenter asserts the Draft EIR failed to comply with CEQA which requires a reasonable range of alternatives to the project which would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant impacts. The Draft EIR analyzed three development alternatives at the project site (in addition to the No Project Alternative). According to CEQA, a Draft EIR must describe a reasonable range of alternatives to the project or project location that could feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant impacts of the Proposed Project (*State CEQA Guidelines* Section 15126.6). An EIR is not required to consider every conceivable alternative to the Proposed Project or alternatives which are infeasible; the EIR must set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (*State CEQA Guidelines* Section 15126, citing *Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App.3rd 274). Accordingly, the Draft EIR has analyzed a reasonable range of alternatives and does not need to analyze another alternative, as suggested by the commenter. Please refer to responses to **Comments 38.9** and **38.10** above.

Comment 38.17

The commenter asserts the alternatives failed to analyze the long term “operational” impacts from noise, light, increased shadows and decreased air quality from the height and mass of the garage and access. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the height and mass of the garage and use of the alley create an unavoidable significant impact and that the analysis in the Draft EIR is not adequate. Please refer to response to **Comment 38.5** above for a complete discussion.

Comment 38.18

The commenter states that 26 single-family homes on the project site would not be an economically feasible alternative but does not provide any economic feasibility analysis to support this claim.

Comment 38.19

The commenter asserts that the number of vehicle trips generated by Alternative 2 should be described as a “greater” reduction of vehicle trips compared to the proposed project rather than “incrementally” reduced vehicle trips compared to the proposed project as described in the Draft EIR. Traffic associated with Alternative 2 would generate 87 fewer net traffic trips when compared with the existing condition on the project site. The proposed revised project would generate a net increase of trips of 956 trips. The commenter also questions that the construction noise impacts of Alternative would be similar to the proposed project because Alternative 2 would generate significant less vehicle trips than the proposed project. Construction noise impacts would also be similar to those for the proposed project. The majority of construction noise impacts would occur during the initial demolition, excavation, and grading phases of site development. Because both the proposed project and Alternative 2 would involve demolition of the church, demolition of the surface parking lot pavement, excavation, and removal of the earthen mound, and leveling of the site for building, the noise associated with these activities would be virtually identical between the proposed project and Alternative 2. Under this alternative, similar machinery would be required to complete these phases. Therefore, the maximum noise levels experienced by nearby residents would be similar to the proposed project and are expected to exceed County standards.

Comment 38.20

The commenter asserts that because Alternative 2 does not propose a garage, long-term significant noise and air quality impacts would be substantially reduced. This comment assumes there are long-term significant and unavoidable air quality and noise impacts associated with the garage. The Draft EIR analyzed potential “operational” air quality and noise impacts of the proposed project which includes and garage and concluded there would not be significant impact. No quantitative or qualitative data or analysis was provided by the commenter for the opinion that long term significant and unavoidable air quality and noise impacts would occur as a result of the proposed project. No further response is necessary. Please refer to **Comment 38.5** to a full detail.

Comment 38.21

The commenter asserts that the Draft EIR did not include a site plan or details for parking and access for Alternative 3 and therefore requires further analysis. The commenter also states that Alternative 3 results in a significant reduction of vehicle trips and should be analyzed further.

Traffic associated with Alternative 3 would generate a net increase of 835 trips, while proposed project would generate a net increase of 1,078 trips. As proposed, the project would mitigate an already significant traffic impact that occurs at the intersection of Grosvenor Boulevard and Jefferson through signalization. Given the net decrease in trips associated with Alternative 3, it is presumed that this significant impact may still occur and may not be mitigated as a result of the implementation of Alternative 3.

Due to the provision of at grade parking of Alternative 3, the height of the structure would be approximately the same height as the proposed Millennium-Playa del Mar Apartments Project. Access to the project site would be the same as the proposed project.

Comment 38.22

The commenter asserts Alternative 4 should not be included because of greater construction costs, the increase in environmental impacts and the height limitation of the project size. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that Alternative 4 is infeasible because of greater construction costs, results in increase environmental impacts, and is taller than allowed by the existing site zoning compared to the proposed project. Four project alternatives (inclusive of the No Project Alternative) were selected that would reduce or change the magnitude of the significant effects of the proposed project while meeting most of the project objectives. In addition, "No Project" Alternative was analyzed as required by CEQA. The No Project Alternative would retain the existing church, leased commercial parking, and single-family residential uses on the site; therefore, no impact to the physical environment would occur..

Due to the larger scale of structures proposed as part of Alternative 4 would result in one new unavoidable significant impact. The increased height of structures proposed as part of Alternative 4 would be substantially taller than other structures occurring in the project area and would stand out in sharp contrast to the existing landscape. The structure proposed as part of Alternative 4 structure would differ substantially from existing code requirements. Although the alternative would concentrate development in a small area and would provide some public park space, this benefit is outweighed by impacts associated with the additional grading requirement and a structure height that is out of character with the surrounding area.

Comment 38.23

The commenter asserts that inclusion of subterranean parking in Alternative 4 confirms that subterranean parking is feasible for the proposed project and should be considered to mitigate or avoid noise, light, increased shadows and decreased air quality impacts from the height and mass of the garage.

One of the project objectives is to “avoid unnecessary environmental impacts associated with grading and excavation by building structures above a level grade to the extent feasible”. Although it is feasible to construct subterranean parking, it would require a significant amount of excavation and grading. Therefore, development of the site under this alternative would result in a greater amount of soil that would need to be exported off site, and thus a greater amount of total truck trips.

The “unmitigated impacts” referred to the commenter were not identified in the Draft EIR and are not quantitatively or qualitatively supported by the commenter. Moreover, which specific impacts (which identifiable thresholds for which environmental topics at the project or cumulative level) are considered “unmitigated impacts” are also not identified or substantiated by the commenter.

The Draft EIR does not identify any specific project-level impacts associated with the above-ground parking garage; therefore no mitigation measures or design alternatives for a subterranean parking garage would be necessary. See response to **Comment 38.5** for a detail response.

Comment 38.24

The commenter asserts the alternatives fail the basic CEQA test of proposing alternatives designed to minimize a project’s environmental impacts. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the Draft EIR failed to include a reasonable range of alternatives that avoid or substantially reduced significant impacts of the proposed project.

The principle purpose of alternatives is to define specific strategies that would avoid or substantially reduce the significant impacts of the project. However, the *State CEQA Guidelines* place some restrictions on the range of alternatives an EIR must address. First, the range of alternatives is limited by the rule of reason. An EIR need not evaluate every imaginable alternative or multiple variations of a single alternative. Second, an EIR need only examine those alternatives that meet most project objectives. Third, the guidelines stipulate that alternatives addressed in an EIR should be feasible and should not be considered remote or speculative. When addressing feasibility, the guidelines state that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to the alternative site.” Lastly, alternatives need not be presented in the same level of detail as the assessment of the proposed project.

All of the alternatives assessed in the Draft EIR were designed to meet the project’s objectives and to reduce identified significant impacts anticipated to occur as a result of the proposed project.

Comment 38.25

The commenter asserts the Draft EIR omitted the most reasonable alternative which includes R-3 zoning, a 35-foot height limit and a High Density 3 land use designation. CEQA requires that the Draft EIR analyze a “reasonable range of alternatives to the project which would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant impacts. The Draft EIR analyzed three development alternatives at the project site (in addition to the No Project Alternative). An EIR is not required to consider every conceivable alternative to the Proposed Project or alternatives which are infeasible; the EIR must set forth only those alternatives necessary to permit a reasoned choice. Accordingly, the Draft EIR has analyzed a reasonable range of alternatives and does not need to analyze another alternative, as suggested by the commenter.

Comment 38.26

The commenter suggests an alternative that would use Juniette Street as the primary point of access and subsequently eliminate environmental impacts from the proposed garage. The Draft EIR analyzed a reasonable range of alternatives and is not required to consider and analyze every alternative. See response to **Comment 38.26**. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the height and mass of the garage create an unavoidable significant impact and that the analysis in the Draft EIR is not adequate. See response to **Comment 38.5**.

Please refer to **Topical Response 2: Traffic and Access** for further information.

Comment 38.27

The commenter asserts that the Draft EIR did not identify and describe the project’s indirect and long-term effects as required by *State CEQA Guidelines* Section 15126.2(a). The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that Draft EIR failed to analyze the project’s indirect and long-term effects.

Comment 38.28

This comment suggests that the Draft EIR failed to study or project the level of decibel readings to the adjacent neighbors from the construction of the garage. Section 4.3 Noise of the Draft EIR fully analyzed noise impacts from construction of the proposed project, including the garage.

Noise levels were calculated to be highest during the phases of site development that included building demolition and removal, site grading, and excavation for the proposed building foundation. During these phases multiple pieces of heavy mobile equipment (backhoes, haul trucks, etc.) would be used on the site. The noise level for building demolition equipment, at a distance of 50 feet is calculated to be 87.7 dB(A).

The noise levels calculated for the foundation and pavement demolition, and fence removal equipment is 93.5 dB(A) at 50 feet.

Noise levels for demolition, grading, and excavation would be audible and substantially above the permitted daytime standards of 75 and 80 dB(A) for single- and multi-family residential land uses and schools, as established in the County Noise Ordinance and shown previously in Table 4.3-2, of the Draft EIR. Construction activities, therefore, are expected to result in intermittent daytime exceedances of the County noise guidelines for short periods. As sensitive receptors are located adjacent to and in the vicinity of the project site, this intermittent increase in noise would result in a significant impact and would most substantially impact those homes located north of the project site. Mitigation measures suggested by the County will reduce construction noise, but not to levels below County significance thresholds, which will result in a short-term, significant and unavoidable noise impact.

Project construction will require the use of heavy trucks to haul equipment and materials to the site, as well as transport debris and earth excavated during demolition of existing structures and grading of the site. Wood and trash debris from demolition would be hauled to the Downtown Diversion Facility in the City of Wilmington, while asphalt and concrete would be hauled to the Lovco crushing facility in Wilmington. To limit noise impacts associated with construction traffic on nearby land uses, truck haul routes have been established which route vehicles away from sensitive uses to the maximum extent feasible. As proposed the haul route will be Grosvenor south to Jefferson and Jefferson east to the 405 Freeway (I-405). Project trucks will transition from the I-405 onto Interstate 10 (I-10) eastbound; trucks will transition from I-10 eastbound onto Olympic Boulevard exit; trucks will continue to travel east on Olympic Boulevard and will enter the Downtown Diversion Facility at 11th Street from Santa Fe Avenue (construction debris receptor location) at 2424 East Olympic Boulevard in Wilmington, California.

Noise impacts from construction traffic would be greatest during the demolition and grading phases of project development, when (excepting construction employees trips) heavy trucks are expected to make up to 38 (round) trips on average per working day to haul debris and excess cut material from the site. This construction traffic would only be traveling to and from the site during working hours. The Los Angeles County Department of Public Works (LACDPW), Construction Division, limits construction activities to between the hours of 7:00 AM and 7:00 PM daily and prohibits work on Sundays and legal holidays. This reduces the impact on local residents by restricting most construction-based noise generation to hours when most residents are at work and not generally home. The number of truck trips traveling along the designated haul route will vary daily, depending on the nature of the construction activity. Employment of standard noise attenuation practices would be implemented as required by the LACDPW. Noise-sensitive land uses located along the haul route are limited to residential used along Jefferson near the project site. Based on the U.S. Department of Transportation Highway Noise Prediction

Model land uses within 50 feet of the haul route could experience temporary noise events ranging from 83 to 88 dB(A), which exceeds County standards outlined above. Therefore, a temporary significant impact would result from trucks traveling to and from the project site along the haul route during the demolition and grading phases of the project.

Mitigation measures 4.3-1 through 4.3-4 are proposed to reduce the severity of construction noise impacts, but not to less than significant.

Comment 38.29

The comments cites to Appendix G of the *State CEQA Guidelines* (4.3-14). The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 38.30

This comment suggests that the Draft EIR failed to analyze operational noise impacts on the single-family homes to the north and east and the approximately 300 apartment residents to the south. Section 4.3 Noise of the Draft EIR analyzed the operational noise impacts summarized in Table 4.3-7, Operational Noise On-Site Impacts, and concluded that it is not a significant impact. Analysis of existing and future noise environments presented in Draft EIR is based on project site noise monitoring, noise prediction modeling and information provided by the project applicant. Noise level monitoring was conducted by Impact Sciences, Inc. using a Larson Davis 820 Type 2 Sound Level Meter, a meter, which satisfies the American National Standards Institute (ANSI) for general environmental noise measurement instrumentation. The nearest noise sensitive receptors identified in the Draft EIR consist of single-family residences located directly north of the site, multi-family residential apartment south of the site and three single-family residences on Juniette Street next to the property's southeast corner. The Draft EIR concludes that the greatest potential increase in noise is from the increase in vehicle trips generated by the proposed project. Table 4.3-7 of the Draft EIR, Operational Noise On-Site Impacts, shows that the project would contribute traffic volumes that would increase noise levels from 0.0 dB(A) to 0.7 dB(A) along studied roadways segments. This increase is not generally perceptible to most individuals and the operational noise levels are close to the applied standard (see **Table 4.3-4**). Therefore, impacts are not considered significant given County noise assessment methodologies and current assessment standards.

The Draft EIR also concluded that noise generated by vehicles traveling on the alleyways along the northern and southern boundaries of the project site could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively.

Access to the proposed leasing office and associated surface parking lot would be provided by a 28-foot-wide alley along the northern boundary of the project site. An 8-foot-tall block wall is proposed along the property line to the north of the access alley. Immediately north of the proposed block wall are single-family residences. Vehicles traveling along the alleyway are generally not expected to exceed a speed of 15 miles per hour (mph) based on the length and width of the alley and because vehicles would slow to access the small surface parking lot near the leasing office. The proposed project analyzed in the Draft EIR would result in 1,078 daily vehicle trips. The number of vehicles traveling along the northern project site boundary would represent a fraction of the overall project-generated trips because the alley would generally be used to access to the leasing office and primary access to the project site would be provided via the access alleyway proposed along the southern boundary of the project site. Therefore, vehicles traveling along the northern alley are not expected to result in a substantial permanent noise source. It is useful to consider the volume of noise which could be generated by all 1,078 project-generated trips traveling along a similar roadway at 15 mph. Model inputs included a roadway width of 28 feet, speed of 15 mph and a distance of 8 feet to the receptor, or the adjacent single-family residences. The proposed 8-foot-tall block wall was not included in the model input. Model results indicate that a noise level of 57.4 dB(A) CNEL could be expected at the adjacent residential land use if all 1,078 project-generated trips were to travel along the alley. As stated previously, solid walls may reduce noise levels by 5 to 10 dB(A). When considering the proposed 8-foot-tall block wall, the noise level would range from 47.4 to 52.4 dB(A) CNEL. As noise generated by vehicles would be lower than this range, the proposed project would not result in a substantial permanent increase in ambient noise at the adjacent single-family residences. Impacts would be less than significant.

The existing alley that runs along the southern boundary of the project site would be widened from 25 to 28 feet and provide access to the proposed parking structure within the southern portion of the project site. Immediately south of the alley are multi-family residences. The residential units within the adjacent multi-family residential buildings are elevated approximately 10 feet above on-site parking garages. Vehicles traveling along the alleyway are generally not expected to exceed a speed of 15 miles per hour (mph) based on the length and width of the alley and because vehicles would slow to access the parking structure. As discussed in Section 4.5, Traffic and Access, of this draft EIR, the proposed project would result in 1,078 daily vehicle trips. As described above, the noise associated with all project-generated trips along a 28-foot-wide roadway at a distance of 8 feet would be 57.4 dB(A) CNEL. As shown in Table 4.3-4, the existing noise levels within the southern portion of the project site currently exceed 57.4 dB(A) CNEL and the County of Los Angeles standard. Noise levels at the existing multi-family residences would be very similar to those on the project site because stationary and mobile noise sources are the same for both. Therefore, based on the above analysis, the proposed project would not result in a substantial permanent increase in ambient noise at the adjacent multi-family residences. Impacts would be less than significant.

Noise generated within the proposed parking structure would include tires squealing, car alarms sounding, car stereos and horns honking. These sources could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively. An analysis of potentially significant impacts is provided below. The parking structure as proposed in the Draft EIR would be partially enclosed with rectangular openings around the perimeter of each level. Multi-family residences located adjacent to the south of the project site would be approximately 37 feet south of the parking structure after project construction. While the partially enclosed structure would act as a barrier, noise generated by vehicles traveling within the parking structure such as tires squealing, car alarms sounding, car stereos and horns honking would pass through the rectangular openings around the perimeter of the structure. These sources of noise may be audible at the northernmost residential units within the adjacent multi-family complexes and may result in temporary annoyances. However, this noise would be temporary and periodic and occur most intensely during the AM and PM peak periods when project residents are leaving or returning from work. Further, the proposed parking structure is not anticipated to introduce a substantial permanent noise source that would exceed defined County Standards in the ambient noise level. Therefore, impacts would be less than significant.

In addition, the garage has been reduced to a maximum height of 35 feet to accommodate a reduced 329 parking spaces and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with facades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural facades to the exterior, the potential for air quality, noise, and aesthetics impacts are avoided through project design features. As with the garage designed and analyzed in the Draft EIR, the revised garage would not create a significant impact.

Comment 38.31

The commenter states that there is no evidence in the Draft EIR that the proposed 8-foot-tall block wall along the property line to the north of the access alley would mitigate an adverse noise impact and that the Draft EIR's conclusion that such an impact would be less than significant is conclusionary and without foundation. The Draft EIR determined that noise generated by vehicles traveling on the alleyways along the northern and southern boundaries of the project site could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively. An analysis of potentially significant impacts is provided below.

Access to the proposed leasing office and associated surface parking lot would be provided by a 28-foot-wide alley along the northern boundary of the project site. An 8-foot-tall block wall is proposed

along the property line to the north of the access alley. Immediately north of the proposed block wall are single-family residences. Vehicles traveling along the alleyway are generally not expected to exceed a speed of 15 miles per hour (mph) based on the length and width of the alley and because vehicles would slow to access the small surface parking lot near the leasing office. As discussed in Section 4.5, Traffic and Access, of this draft EIR, the proposed project would result in 1,078 daily vehicle trips. The number of vehicles traveling along the northern project site boundary would represent a fraction of the overall project-generated trips because the alley would generally be used to access to the leasing office and primary access to the project site would be provided via the access alleyway proposed along the southern boundary of the project site. Therefore, vehicles traveling along the northern alley are not expected to result in a substantial permanent noise source. It is useful to consider the volume of noise which could be generated by all 1,078 project-generated trips traveling along a similar roadway at 15 mph. Model inputs included a roadway width of 28 feet, speed of 15 mph and a distance of 8 feet to the receptor, or the adjacent single-family residences. The proposed 8-foot-tall block wall was not included in the model input. Model results indicate that a noise level of 57.4 dB(A) CNEL could be expected at the adjacent residential land use if all 1,078 project-generated trips were to travel along the alley. As stated previously, solid walls may reduce noise levels by 5 to 10 dB(A). When considering the proposed 8-foot block wall, the noise level would range from 47.4 to 52.4 dB(A) CNEL. As noise generated by vehicles would be lower than this range, the proposed project would not result in a substantial permanent increase in ambient noise at the adjacent single-family residences. Impacts would be less than significant. In addition, the project now proposes an 8-foot-tall wall instead of an 8-foot-tall wall.

An 8-foot-tall block wall would provide attenuation of 11.4 dB(A) CNEL. This wall along with the development of parking garages between the project access drive and the residential units to the north will attenuate sound to a level less than 50 dB(A) CNEL.

Comment 38.32

The commenter asserts the Draft EIR did not analyze the noise impacts generated by the garage on the adjacent apartments. See response to **Comment 38.28** and response to **Comment 38.30** that address operational and construction noise impacts from the proposed project that includes the parking garage.

Comment 38.33

The commenter asserts the Draft EIR provides no evidence that the parking structure would not exceed County noise thresholds. Please see response to **Comment 38.32** above.

The commenter also states the County's noise standards are not the CEQA test for environmental impacts. The County of Los Angeles Department of Regional Planning as lead agency for this project determines threshold interpretation standards for the CEQA documents. That is not unique to this

project, but standard practice for projects subject to CEQA review through the County of Los Angeles Department of Regional Planning. Section 4.3.4 of the Draft EIR notes the local and state regulatory considerations to assess noise impacts generated by the proposed project. Noise impacts were assessed for consistency with the County of Los Angeles Noise Ordinance, (2) the County of Los Angeles General Plan Noise Element, and (3) The California Code of Regulations, Title 24, Part 2.

Comment 38.34

The commenter states the project's traffic study relied in faulty premises affecting the location of the access and the amount of vehicle trips generated. The commenter does not provide substantial evidence why the traffic study is faulty. The traffic study that assessed potential impacts of the proposed project was prepared in consultation with the Los Angeles Department of Transportation (LA DOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). This consultation and approval included substantive review and agreement with existing conditions, trip credit, trip generation, trip distribution, future conditions, related projects, cumulative impacts, etc. assumptions used by RAJU Associates, Inc to conduct the analysis.

Please refer to **Topical Response 2: Traffic and Access** for further information.

Comment 38.35

The commenter states the existing church has different access that the proposed access for the project and that the church's main traffic volumes are generated on the weekends. Please see response to **Comment 38.34** above.

Comment 38.36

The commenter asserts that the net credit for the church trips should not be included because the church trips are generated on the weekends. Please see **Topical Response 2: Traffic and Access** for detailed discussion on the church trips generated and overall trip generation counts.

Comment 38.37

The commenter states the 1,433 daily trip generated by the proposed project should be used rather than 1,078 trips factoring in the existing church use trip credit. Please see **Topical Response 2: Traffic and Access** for detailed discussion on the church trips generated and overall trip generation counts.

Comment 38.38

The commenter cites to Appendix G of the *State CEQA Guidelines* (4.5-11) and states one of the two portions of the "street system" is an alley and not a public street. The traffic study that assessed potential impacts of the proposed project was prepared in consultation with the Los Angeles Department of

Transportation (LA DOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). This consultation and approval included substantive review and agreement with existing conditions, trip credit, trip generation, trip distribution, future conditions, related projects, cumulative impacts, etc. assumptions used by RAJU Associates, Inc to conduct the analysis. Please see **Topical Response 2: Traffic and Access** for detailed discussion the analysis of the alley.

Comment 38.39

The commenter generally describes the contents of the Draft EIR Air Quality analysis. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 38.40

The commenter asserts that the Draft EIR does not analyze air quality impacts from motor vehicles on the adjacent single-family homes and apartments. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that the air quality section is not adequate.

The Draft EIR states that operational emissions would be generated by both stationary and mobile sources as a result of normal day-to-day activity on the site after occupation. Stationary emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, and from the use of consumer products. Mobile emissions would be generated by motor vehicles traveling to and from the project site. Trip generation rates were obtained from the traffic report for the proposed project. The operational stationary and mobile emissions are provided in Table 4.4-15, Estimated Unmitigated Operational Emissions. The net emissions, which account for emissions generated from the existing church and single-family home, are compared to the SCAQMD significance thresholds. As shown in Table 4.4-15, the net emission increase associated with the proposed project at build out and in full operation would not generate emissions that would exceed SCAQMD thresholds during the summer or the winter. Therefore, daily operational emissions generated by the proposed project would be considered to create a less than significant impact.

Comment 38.41

The commenter asserts that the Draft EIR did not analyze the visual impacts of the garage upon the adjacent single-family homes and three apartment buildings to the south. Aesthetics, light, and glare were all assessed in details in the Draft EIR in Section 4.6 Visual Resources. Project and site-specific visual simulations were prepared for impact analysis. Additionally, shade and shadow simulations were

prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the apartment buildings along Jefferson Boulevard because the proposed new building will be to the north of the existing structures. This analysis is found subsection 4.6.4.4, Project Analysis (Shade/Shadow). In addition, the Recirculated Draft EIR includes additional analyses of Visual Resources and concluded that the proposed project would not create a significant impact.

Comment 38.42

The commenter states that the proposed “green screen” of the garage and a row of tall, planted trees is too vague and speculative as an adequate mitigation measure. The Draft EIR concluded that the proposed project would not create a significant visual resources impact. The green screen and landscaping was proposed as a project design feature but it is not a mitigation measure to reduce an identified significant impact. Since circulation of the Draft EIR, the garage has been reduced in size and redesigned. 329-space parking garage would now have a maximum height of 35 feet and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with facades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural façades to the exterior, the potential for air quality, noise, and aesthetics impacts are avoided through project design features. Please refer to **Topical Response 3: Project Design and Height**, for additional information.

Comment 38.43

The commenter asserts that the Draft EIR did not include studies or analysis that “shade impacts associated with the proposed project are not considered significant.” Aesthetics, light, and glare were all assessed in details in the Draft EIR in Section 4.6 Visual Resources. Project and site-specific visual simulations were prepared for impact analysis. Additionally, shade and shadow simulations were prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the apartment buildings along Jefferson Boulevard because the proposed new building will be to the north of the existing structures. This analysis is found subsection 4.6.4.4, Project Analysis (Shade/Shadow).

Comment 38.44

The commenter states that the Draft EIR is inadequate and does not justify a zone change to R-4. The primary purpose of CEQA is to inform decision makers and the public about the potential impacts of a proposed project and identify ways that impacts can be avoided or reduced and not to provide justification to approve a proposed project. For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Section 4.1, Land Use and Planning, of the public Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant and unavoidable impact.

Comment 38.45

The commenter expresses that the applicant is not responsive to community concerns. In response to community concerns the project developer substantially revised the project as described in the Recirculated Draft EIR Project Description Section. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 38.46

The commenter expresses an opinion that the proposed project is more intense than typical R-3 and R-4 zoned properties and is poorly designed. For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**. No further comment is necessary.

Section 4.1, Land Use and Planning, of the public Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant and unavoidable impact.

Comment 38.47

The commenter asserts that the EIR is inadequate because it does not include an alternative suggested by the commenter. The commenter also claims that if Juniette Street were extended it would avoid channeling 1,433 vehicle trips into the 28-foot-wide alley and driveway adjacent to single-family homes. CEQA requires that the Draft EIR analyze a “reasonable range of alternatives to the project which would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant impacts. The Draft EIR analyzed three development alternatives at the project site (in addition to the No Project Alternative). An EIR is not required to consider every conceivable alternative to the Proposed Project or alternatives which are infeasible; the EIR must set forth only those alternatives necessary to permit a reasoned choice. Accordingly, the Draft EIR has analyzed a reasonable range of alternatives and does not need to analyze another alternative, as suggested by the commenter. Please refer to **Topical Response 2: Traffic and Access** and Section 4.5 Traffic and Access for further information about existing and future trip generation patterns and the project’s impacts.

Comment 38.48

The commenter state the Draft EIR should be recirculated because the commenter presented “significant” new information. It is common for comments received on the contents of a Draft EIR to request additional information, additional analysis, and further proof for the impact determinations included in a Draft EIR, typically included as a part of a Final EIR. This additional information and analysis may be addressed as revisions to the text of the Draft EIR, as a part of the response to comments section of the Final EIR, or both. This new analysis or information does not necessitate recirculation of the Draft EIR.

For the purpose of evaluating the statements made in this comment letter, the contents of the Millennium-Playa del Mar Apartments Project Draft EIR related to recirculation, *State CEQA Guidelines* Section 15088.5 Recirculation of an EIR Prior to Certification is provided in its entirety below:

A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish & Game Com. (1989) 214 Cal.App.3d 1043).*
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.*
- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.*

- (e) *A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.*
- (f) *The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.*
- (1) *When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.*
- (2) *When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.*
- (3) *As part of providing notice of recirculation as required by Public Resources Code Section 21092.1, the lead agency shall send a notice of recirculation to every agency, person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR in order to be considered by the agency.*
- (g) *When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.*

Note: Authority cited: Section 21083, Public Resources Code. Reference: Section 21092.1, Public Resources Code; Laurel Heights Improvement Association v. Regents of the University of California (1993) 6 Cal. 4th 1112.

The comment suggests that a recirculated Draft EIR is needed based on his evaluation of an analysis of "Unmitigated" impacts to long-term air quality, noise, traffic and visual resources are either inadequate or omitted.

However, the project as proposed and as assessed in the Draft EIR is accurately described and the Draft EIR provides full disclosure and analysis for the potential construction as well as short term and long term operational impacts associated with the project proposed in the Draft EIR.

The commenter raises concerns related to the following process or environmental areas: project description, land use and planning, noise, air quality, traffic and access, visual resources, and alternatives analysis. All of these areas were analyzed as required by the Department of Regional Planning and were assessed through qualitative and quantitative means in the Draft EIR, using methods approved by the various responsible departments in the County of Los Angeles. The commenter does not provide new “significant” information based on facts, reasonable assumptions based on facts, or expert opinion supported by facts that the Draft EIR should be recirculated based on the criteria set forth in *State CEQA Guidelines* Section 15088.5 Recirculation of an EIR Prior to Certification.

Comment 38.49

The commenter suggests an alternative and claims the alternatives would lessen the impacts the adjacent single-family residents and apartments. The commenter does not provide any information based on facts, reasonable assumptions based on facts, or expert opinion supported by facts that the suggested alternative would lessen any of the project’s significant impacts identified in the Draft EIR. Please see response to **Comment 38.7** above.

Comment 38.50

The commenter states the CEQA requires an explanation of how alternative were selected and identify alternatives that were rejected as infeasible and provide reasons why they were rejected.

Comment 38.51

The commenter asserts the traffic inaccurately accesses the project’s vehicle trips. The traffic study that assessed potential impacts of the proposed project was prepared in consultation with the Los Angeles Department of Transportation (LA DOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). This consultation and approval included substantive review and agreement with existing conditions, trip credit, trip generation, trip distribution, future conditions, related projects, cumulative impacts, etc. assumptions used by RAJU Associates, Inc to conduct the analysis.

Please refer to **Topical Response 2: Traffic and Access** for further information.

Comment 38.52

The commenter claims the Draft EIR should be recirculated because it should include a suggested alternative preferred by the commenter. Please see response to **Comment 38.7** that the Draft EIR complies with CEQA and analyzed a reasonable number of alternatives.

The commenter also asserts the inaccurate traffic study and suggested significant impact of the garage on the adjacent apartment homes are severe environmental impacts that require recirculation of the Draft EIR. Please refer to response to **Comment 38.45** above and **Topical Response 2: Traffic and Access**.

Comment 38.53

Commenter asserts that the traffic study be amended and recirculated. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that traffic study is not adequate.

Comment 38.54

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

April 28, 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

*RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
Case Nos.: RENVT200600147, RCUPT200900150, RZCT200900013, RPAT2009000013*

1

I am writing to oppose the change of zoning to accommodate the Millennium Playa Del Mar Project. The project proposes to add 216 apartment units (60 feet tall) along with a 433-space parking structure (56 feet tall) in the heart of a neighborhood of single story homes in Del Rey. The General Plan calls for low density in this area. The enormity of this project conflicts with existing land use plans of the General Plan. The families in the community stand to bear a the burden of the environmental impacts such as a permanent increase in ambient noise levels in the project vicinity, a significant impact on air quality, a significant and unavoidable impact on VOC emissions and significant visual impacts. If the project were to be built by the density limit allowed under the existing zoning much of these impacts could be mitigated.

The density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched development being located adjacent to one another. This project conflicts with the intended density of the General Plan designation for the project site.

2

Enclosed please find a letter from our Councilman Bill Rosendahl opposing the project, a petition from the residents closest to the project who oppose the proposed development and a recent letter sent by the Del Rey Homeowners & Neighbors Association.

3

In 2008 a development of the same height and same density was proposed in this location. Residents opposed the project due to the environmental impacts. The project was also opposed by the Del Rey Neighborhood Council, the Del Rey Homeowners & Neighbors Association and our neighboring LA City Councilmember Bill Rosendahl. Please see the attached letters and extensive petition that was submitted in 2008 about the identical project.

4

I do not oppose the project outright, I only ask that the project be built out as it is allowed under the General Plan today, with no upzoning.

5

Sincerely,

Elizabeth Zamora
President, Del Rey Homeowners & Neighbors Association

Comment Letter No. 39

Elizabeth Zamora, President
Del Rey Homeowners & Neighbors Association
P.O. Box 661450
Los Angeles, California 90066
Letter dated April 28, 2010

Comment 39.1

Commenter expresses opposition to the proposed project and that the community will be burdened by the permanent increase in ambient noise levels, a significant impact on air quality, a significant and unavoidable impact from VOC emissions, and significant visual impacts. The commenter asserts that the above impacts could be mitigated if a project was built by the density limit allowed under the existing R-3 zoning. Please refer to **Topical Response 1: Project Density and Land Use Compatibility**, **Topical Response 2: Traffic and Access**, and **Topical Response 3: Project Design and Height**. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 39.2

The commenter states that the density limits in the General Plan are intended to mitigate the aesthetic and harmful effects of mismatched developments being located adjacent to one another and that the proposed project conflicts with the intended density of the General Plan land use designation for the project site. Section 4.1, Land Use and Planning, of the Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant and unavoidable impact.

For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Comment 39.3

The commenter references a letter from City of Los Angeles Councilman Bill Rosendahl, a petition from the residents in the area of the project site and a letter sent by the Del Rey Homeowners & Neighbors Association opposing the project. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 39.4

The commenter references opposition letters from a project proposed in 2008 by a different applicant. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 39.5

The commenter requests that the project be built as allowed under the existing General Plan land use designation with no zone change. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Kim, Mi

From: susiestree@aol.com
Sent: Friday, April 30, 2010 3:56 PM
To: susiestree@aol.com; Child, Mark; Maxmoz@aol.com
Cc: KKatona@bos.lacounty.gov; Kim, Mi; Curzi, Anthony; drosenfeld@bos.lacounty.gov
Subject: your suggestion re: land use and noise impact for the configuration at the SH Oaks Galleria

Dear Mr. Child:

I just wanted to update you and thank you again for your interest and thoughtfulness when we met this week with Ms. Katona. I appreciated your remembering **one** place in this city that has a parking garage that faces the units of an apartment complex. I had been studying the landscape for weeks since seeing the Dinerstein plans and had not found any building configured with neighboring buildings as they have designed.

I visited the Sherman Oaks Galleria at your suggestion and specifically the Grand Apt Complex that fronts Sepulveda and faces the parking garage of the Galleria to it's rear. As I noted in my earlier e-mail, this apartment property was built **after** the building of the Galleria and at the **choice** of the builder.

The entire complex had double pane windows and central air that we, at Club Marina, do not have. Unlike our building that has all rear units with patios and all front loft units with rooftop decks that face the rear, this building at the Galleria had only a "fake facade of a patio and merely windows that open to this garage.

I must say that the noise from Sepulveda and the parking garage were all quite profound with car radios blaring as cars pulled into the garage to park, but all of this noise didn't compare to the 405 frwy and the 101 that cross at that intersection. It was all very loud and unpleasant.

The people who live in the complex must not open their windows at all and only use their AC. I was thinking that the people who chose to live in this complex, must have just moved to LA from maybe Manhattan, where noise like this is more common.

Also, the Galleria parking garage was not 20 feet taller then the Grand Apartments. They were about the same height. The proposed height of the Dinerstien project is 20 feet + higher then our building and it will absolutely take away our entire view and light. Even though the Sherman Oaks apartments were about the same height and not 20+ feet taller then the Galleria garage, it was still very dark in the roadway between the two buildings. It was late afternoon when I was there and only the very top floor of the apartment complex in the rear of the building facing west got just a little sun light peeking over the parking structure.

I walked off the drive between the garage and building and it was a little more then 30 feet from the parking structure, which is similar to our configuration according to the

Dinerstein plans.

7

The Grand is over 200 units, like Dinerstein wants to build, and their parking was underneath their building. Obviously the Galleria parking garage was for the Galleria, not these units.

8

My visit unfortunately only affirmed my resolve that the plans for this project at the City of Angels Church property are highly inadequate and the density of this project out of proportion to the neighborhood, but it was an excellent and thoughtful suggestion. It gave me a first hand visual of what to expect and what I have to expect, if this project goes forward as planned, is disastrous for my building and my tenants.

9

I thank you.

Most sincerely-
Susan Boyer
owner of 12435 West Jefferson
818 995 8772

-----Original Message-----

From: susiestree@aol.com
To: mchild@planning.lacounty.gov; Maxmoz@aol.com
Sent: Tue, Apr 27, 2010 12:24 pm
Subject: thank you for meeting with us

Dear Mr. Child,

Wayne, Debby and I would all like to thank you for your time and interest yesterday at our meeting arranged by Mr. Thomas's office.

I really found you to be informative and most thoughtful. I plan to visit the Sherman Oaks Galleria tomorrow and observe the configuration of their parking garage to their apartment complex. I gave it further thought last night and I would like to note that their apartment building at the Galleria was built **after** the development of the Galleria--at the choice of the developer. Our apartment complex and it's design came first to this situation we are now faced with.

Many thanks again-

Susan Boyer
818 995 8772

Comment Letter No. 40

Susan Boyer
Owner of 12435 West Jefferson
E-mail dated April 30, 2010

Comment 40.1

The commenter expresses appreciation for meeting to discuss the parking garage location with County staff. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.2

The commenter states they visited the Sherman Oaks Galleria and the Grand Apartment complex that front Sepulveda Boulevard and faces the parking garage of the Galleria to the rear. The commenter states the apartment property was constructed after the Galleria. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.3

The commenter notes that the Grand Apartment complex has double pane windows and central air unlike the Club Marina apartments adjacent to the project site. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.4

The commenter states the noise from Sepulveda and the parking garage were profound but does not compare to the 405 freeway and 101 at that intersection. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.5

The commenter assumes the residents of the Grand Apartment complex do not open their windows and use air conditioning all the time. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the

adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.6

The commenter asserts the height of the proposed project will be over 20 feet higher than the Club Marina apartment complex and take away the entire view and light. The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The proposed project will increase the width of the existing alley from 25 feet to 28 feet to create more distance between the proposed parking garage and existing Club Marina apartment complex. Further, the proposed parking garage will have a maximum height of 35 feet, which is 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary. Aesthetics, light, and glare were all assessed in details in the Draft EIR in Section 4.6 Visual Resources. Project and site-specific visual simulations were prepared for impact analysis. Additionally, shade and shadow simulations were prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the apartment buildings along Jefferson Boulevard because the proposed new building will be to the north of the existing structures. This analysis is found subsection 4.6.4.4, Project Analysis (Shade/Shadow).

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.7

The commenter states the drive aisle between the Sherman Oaks Galleria garage and Grand Apartment complex is 30 feet which is similar to the distance from the proposed garage to the Club Marina Apartments. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.8

The commenter state the Grand Avenue Apartments constructed subterranean parking.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 40.9

The commenter expresses an opinion that the density of the proposed project is out of proportion with the neighborhood and would be harmful to the tenants of 12435 West Jefferson. The commenter does not provide information based on facts, reasonable assumptions based on facts, or expert opinion supported by facts that proposed project would result in significant impacts to the tenant of 12435 West Jefferson.

Please refer to **Topical Response 1: Project Density and Land Use Compatibility**, **Topical Response 2: Traffic and Access**, and **Topical Response 3: Project Design and Height**.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

May 9, 2010

Attention: Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

1

*RE: Millennium Playa del Mar Apartment Project, County Project Number R2009-02015
Case Nos.: RENV200600147, RCUP200900150, RZCT200900013, RPAT2009000013*

In response to the draft EIR for the above referenced project, the Del Rey Homeowners & Neighbors Association would like to submit the following items for consideration.

We oppose any change of zoning to accommodate the Millennium Playa Del Mar Project. The project proposes to add 216 apartment units (60 feet tall) along with a 433-space parking structure (56 feet tall) in the heart of a neighborhood of single story homes in Del Rey. The General Plan calls for low density in this area. This project conflicts with existing land use plans of the General Plan.

2

We do not oppose the project outright, we only ask that the project be built out as it is allowed under the General Plan today, with no upzoning from R-3 to R-4.

3

The developer (Din/Cal) states it has made efforts to engage the community through door to door outreach and ongoing community meetings. As witnesses to the countless requests from residents that the project be changed, we have not received any gesture from the developer that they plan to make any changes in response to what community has stated. No design changes have been made. As an attachment, we submit to you the letter sent to us by the developer. On April 22, 2010, Josh Vasbinder of Din/Cal 2, Inc. ("Din/Cal") sent a written response to the DRHNA's January 2010 letter commenting on the Notice of Preparation. This letter from the developer to the community is a justification of every aspect of their project, rather than any compromise or offer to accommodate the residents and renters who will be most impacted. This shows a unwavering will on the part of this developer to push through their plan without any consideration of the surrounding community.

4

In exchange for the upzoning, Din/Cal has suggested various amenities it might provide, e.g. a financial contribution to Playa del Rey Elementary School; assistance to purchase the single family residence (11,000 sq. ft.) on Juniette St. that is for sale for about \$900,000. (The county has said it might contribute \$500,000 so that land could be purchased for use as a park, but someone else would need to come up with the balance); installation of speed bumps in the north-south alley. We know for a fact that in the City of Los Angeles, the Department of Transportation would not allow installation of speed bumps in an alley, and the speed bumps would be to slow down the residents of the single family dwellings, not the Din/Cal project.

5

DRH&NA's position is that the community amenities that are offered cannot in any way diminish the negative environmental impacts of the project as it is proposed.

5

At our April 2010 board meeting, Josh Vasbinder said that if they did not get the upzoning to R-4, they would seek a density bonus for R-3 that would allow them to increase the height of the project to 45 feet. According to Vasbinder, an R-3 project "just doesn't work." However, to get the density bonus, SB 1818 would require Din/Cal to prove that the project would not be economically viable without the density bonus. The "affordable housing" units would also be locked in for 30 years, so the property could not be converted to saleable condominium units.

6

The developer is seeking to upzone the 4.9 acre parcel so it can build 216 apartments in a four story complex. Vasbinder states that the project density will be 50 units/acre whereas the apartments next door are 99 units/acre, i.e. the Din/Cal apartments are larger. This comparison of density is not equitable because the existing apartment buildings were built with underground parking to meet the allowed zoning (35 ft. height) whereas the Din/Cal apartments intend to erect a 60 foot tall above ground parking structure. So the lower density per acre of the Din/Cal project does not translate into a lesser impact, on the contrary the size of the Din/Cal project is much larger.

7

The parking garage has been placed to abut the existing apartment renters on the south side. The design is such so that the new residents of the proposed development can park on the same level where they live ("wrap design"). While this design may be a nice amenity for the new tenants, it will create a 60 foot tall wall of continuous gas emissions, noise and vibrations to the existing apartment renters who live in the 35 foot tall buildings on Jefferson Blvd. Why can't this developer (Din/Cal) be as conscientious as the adjoining three developers and spend the money on proper design to build parking underground?

8

The present R-3 zoning would authorize construction of 132 apartments or a project of 28 – 30 townhomes (6 units/acre). Din/ Cal is requesting a change in zoning to allow 216 units. Josh Vasbinder stated that the project will provide housing, which is something that is needed in Los Angeles. However, we believe Din/Cal is overutilizing a site that does not have enough infrastructure.

9

The primary access to the property will be on Grosvenor Blvd. between the single family residences to the north (Beatrice St.) and the north side of this project. There will also be access down a 28 foot wide alley between the project and the apartment buildings on Jefferson Blvd..

10

Grosvenor Blvd. is a cul-de-sac, so traffic on Grosvenor cannot turn right or left into any side streets (other than this alley) to get out of the area.

11

The north-south alley that runs between Lucile St. and Jefferson Blvd. is closed to northbound traffic at Juniette St.. The alley is not straight, and the width varies from 20' to 25' wide. The Juniette/Centinela Ave. intersection is not a controlled intersection, and it is located only one block north of Jefferson Blvd., so when traffic on Centinela Ave. backs up past Juniette St., there is no way to get in/out.

12

It can be anticipated that drivers will continue to use the alley between the apartment buildings and the project as a cut-through to reach Centinela Ave. or Jefferson Blvd. from Grosvenor Blvd.. A signal at Grosvenor Blvd./Jefferson Blvd. will not solve the problem.

13

The four office buildings in Playa Vista (400,000 sq. ft.) are not yet occupied, and Playa Vista Phase II has not yet been built, so the impact of that traffic on the Jefferson/Centinela intersection is unknown.

14

The Vasbinder letter talks about the project's effect on local traffic, but it does not address the difficulty that project residents will face when they try to get in/out of the project.

15

The Vasbinder letter stated that because this will be a rental project, it will not be required to pay any Quimby funds. However, if one assumes that the Dinerstein project will bring 500 new residents to the area, and the national standard is three acres of parks for every 1000 residents, the project should add 1.5 acres of parkland to the local infrastructure.

16

Vasbinder suggested that the residents would have access to the parks being built in Playa Vista Phase II, but the acreage of those parks was calculated based on the people that Playa Vista would be adding to the area.

17

The Housing Element of the Los Angeles County General Plan seeks to promote walkable, mixed use neighborhoods near employment and transit. This project does not fit that bill. If one wanted to take a bus down Centinela Ave. from Jefferson Blvd. to Venice Blvd., it would take 1 hr. and 15 minutes or 1 hr. and 40 minutes, and for either available route, one would need to change buses at least once. In other words, it would be faster to walk.

18

In Los Angeles County, the monthly affordable rent for a one bedroom apartment (2 persons) is \$1,366 for a family of moderate income (\$59,600 per year for two persons). Half of this project will be one bedroom apartments, and the rents for all of the units are slated to be well above the "affordable" rate (average \$2500 per month per Vasbinder.)

19

The state density bonus law (Government Code section 65915ff) is an incentive setup. A developer that wants a density bonus must show that the project would not be economically viable without the zoning variance. We suggest the County of Los Angeles require a similar showing if you are going to consider an upzoning from R-3 to R-4, particularly given that this project will not increase the stock of affordable housing in any way.

20

On April 27, 2010, LA City Councilman Bill Rosendahl sent a letter to Anthony Curzi at the Department of Regional Planning expressing his concerns regarding the project and urging Los Angeles County to deny the request for a general plan amendment and to deny the request for a zone change.

21

During the last week of April, myself and other community members met with Karly Katona, deputy to Supervisor Mark Ridley-Thomas, to express our concerns with the design of the project, which has not changed since the proposal was presented to us in 2008. The supervisor's staff suggested a meeting between the neighbors and the developer. The developer has made it

22

clear to us in public meetings that a change in their design “will not pencil out” for them. We urge the county to look beyond the fiscal interests of this developer and consider the impact of this project. We will continue to meet with the developer and hope that they can offer a design that will reduce the environmental impacts of this project on the residents near it.

Sincerely,

Elizabeth Zamora
President, Del Rey Homeowners & Neighbors Association
P.O. Box 661450
Los Angeles, CA 90066
president@delreyhome.org

22

Comment Letter No. 41

Elizabeth Zamora, President
Del Rey Homeowners & Neighbors Association
P.O. Box 661450
Los Angeles, California 90066
Letter dated May 9, 2010

Comment 41.1

The comment states the Del Rey Homeowners & Neighbors Association is providing comments on the Draft EIR. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.2

The commenter states opposition to the proposed project and that the project conflicts with the existing land use plans of the General Plan. Please refer to **Topical Response 1: Project Density and Land Use Compatibility**, **Topical Response 2: Traffic and Access**, and **Topical Response 3: Project Design and Height**.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.3

The commenter expresses an opinion that the project be built as allowed under the current General Plan with no zone change. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.4

The commenter states the project applicant has not been receptive to requests from neighborhood residents to change the project. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

The project site plan has been redesigned after a series of numerous community meetings. The number of residential units proposed in the project has been reduced due to input from community stakeholders.

The proposed parking garage has been redesigned to be smaller, shorter, and completely sealed. Please refer to the Recirculated Draft EIR Project Description section which fully describes the changes to the project analyzed in the Draft EIR.

In addition, please refer to **Topical Response 1: Project Density and Land Use Compatibility**, **Topical Response 2: Traffic and Access**, and **Topical Response 3: Project Design and Height**, for additional information.

Comment 41.5

The commenter describes community benefits proposed by the applicant and states the benefits cannot diminish the environmental impacts as proposed. Section 21081 of the California Public Resources Code and Section 15093(b) of the *State CEQA Guidelines* provide that when the decisions of the public agency allows the occurrence of significant impacts identified in the Final EIR that are not substantially lessened or avoided, the lead agency must state in writing the reasons to support its action based on the Final EIR and/or other information in the record. Article I of the City's CEQA Guidelines incorporates all of the *State CEQA Guidelines* contained in Title 15, California Code of Regulations, Sections 15000 et seq. and thereby requires, pursuant to Section 15093 (b) of the *State CEQA Guidelines*, that the decision maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects identified in the Final EIR cannot be substantially lessened or avoided. The findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Final EIR, the source references in the Final EIR, and other documents and material that constitute the record of proceedings. Accordingly, the County will be required to adopt a Statement of Overriding Considerations if it decides to approve the proposed project. The Statement of Overriding Considerations must balance the benefits of the project against the significant and unavoidable impacts created by the project.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.6

The comment discusses a potential density bonus project if the proposed project was not approved. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.7

The commenter asserts the Draft EIR density analysis is flawed because the apartment complex to the south of the project site includes subterranean parking and a height of 35 feet. Density is calculated as the total number of units divided by the acreage of the project site. Even if the proposed project including subterranean parking, the density would remain the same. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.8

The commenter states the parking garage would create a 60 feet wall of continuous gas emissions, noise and vibrations and wants the project to include subterranean parking. The commenter provides no substantial evidence that the garage would create significant environmental impacts. Please refer to response **Comment 38.5** for a detailed discussion on the garage.

The Draft EIR fully analyzed air quality, noise, and traffic impacts of the proposed project. While the project would create temporary significant noise and air quality impacts during construction, there would be no significant air quality, noise or traffic impacts from operation of the proposed project. The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The proposed project will increase the width of the existing alley from 25 feet to 28 feet to create more distance between the proposed parking garage and existing Club Marina apartment complex. Further, the proposed parking garage will have a maximum height of 35 feet, which is 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary.

A total of 353 parking spaces (329 spaces in a parking garage, 20 parking spaces in private garages, and 4 on-grade parking spaces opposite the leasing office) would be provided as a part of the proposed project. The 329-space parking garage would have a maximum height of 35 feet and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with façades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural facades to the exterior, the potential for air quality, noise, and aesthetics impacts are avoided through project design features. Please refer to **Topical Response 3: Project Design and Height**, for additional information.

Also refer to **Topical Response 2: Traffic and Access** for additional information.

Comment 41.9

The commenter states an opinion that the proposed project is overutilizing a site does not have enough infrastructure. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.10

The comment describes the proposed access of the project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.11

The comment describes the current design and function of Grosvenor Boulevard. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.12

The commenter describes the traffic pattern and dimensions of the north-south alley to the south of the project site and assert that when the traffic backs up on Centinela Avenue past Juniette Street, there is no way to get in or out. Please refer to **Topical Response 2: Traffic and Access** for a detailed discussion on existing and future alley conditions.

Comment 41.13

The commenter states that vehicles will continue to use the alley as a cut-through to reach Centinela Avenue or Jefferson Boulevard from Grosvenor Boulevard and that a signal at Jefferson Boulevard and Grosvenor Boulevard will not solve the problem. Please refer to **Topical Response 2: Traffic and Access** for a detailed discussion on existing and future alley conditions.

Comment 41.14

The commenter states the four office buildings at Playa Vista are not yet occupied and Playa II has not been built, so the impact of that traffic impact at Jefferson and Centinela is unknown.

The project's potential traffic and circulation impacts were assessed in a traffic study prepared by RAJU Associates, Inc. in December 2009. This traffic study is included as Appendix 4.5 Traffic Impact Analysis in the Draft EIR. This traffic study was prepared in consultation with the Los Angeles Department of Transportation (LADOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). In order to properly evaluate the potential impact of the

proposed project on the local street system, the Traffic Study estimated the traffic volumes both with and without the Project projected to 2013. The Future Year 2013 without the Project was first developed including estimates for background growth in area-wide trip making and trips generated by future developments in the vicinity of the study area. The Future (2013) without Project traffic represents the cumulative base conditions. The Cumulative (2013) Base traffic projections reflect growth in traffic from two primary sources: Firstly, the background or ambient growth to reflect the effects of overall area-wide regional growth both within and outside the study area; and secondly, from traffic generated by specific cumulative projects located within, or in the vicinity of, the study area. The second potential source of traffic growth in the study area is that expected from other future development projects in the vicinity. These "cumulative projects" are those developments that are planned and expected to be in place within the same timeframe as the proposed project. Data describing cumulative projects in the area was solicited from the City of Los Angeles, County of Los Angeles, and City of Culver City. Thirty-eight cumulative projects were identified within the study area. The locations of these projects are shown in Figure 5 of the Traffic Study. The trip generation estimates for the related projects were provided by the City of Los Angeles, the City of Culver City and from traffic studies for specific related projects indicated in Table 3 of the Traffic Study. Table 3 summarizes the trip generation of related projects. As indicated in Table 3, the cumulative projects are expected to generate approximately 11,316 trips during the morning peak hour and 14,372 trips during the evening peak hour. The geographic distribution and the traffic assignment of the cumulative projects were performed and the results are illustrated in Figure 6. These related projects' traffic estimates were added to the Existing plus Ambient Growth (2013) traffic to obtain the Cumulative (2013) Base traffic volumes. Figure 7 provides the Cumulative (2013) Base traffic volumes at each of the analysis intersections during both AM and PM peak hours. These volumes represent Future (2013) Cumulative Base (without project) conditions.

Comment 41.15

The commenter states a letter from the project developer does not address the difficulty the project residents will endure when they access the proposed project. Please see **Topical Response 2: Traffic and Access**. The Draft EIR concluded the project would provide sufficient access and would not create a significant impact. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.16

The commenter references a letter from the project developer that Quimby fees will not be required because apartments are proposed and asserts the project should provide 1.5 acres of parkland to the local infrastructure. Park fees (Quimby) are only required by the County in conjunction with an approved

residential subdivision. See Los Angeles County Municipal Code Section 21.28.140 Park fees required when—Computation and use.

The County of Los Angeles Department of Parks and Recreation has recommended that no park fees are required for this project. In addition, the future publicly accessible parks will be built for Playa Vista, which will appropriately serve the new residents of the Millennium-Playa del Mar Apartments project.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.17

The commenter states the project developer advised that residents of the proposed project would have access to the parks being built in the Playa Vista Phase II Project and that the acreage of those parks was based on the number of residents in the Playa Vista Phase II Project. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.18

The commenter states that the Housing Element seeks to promote walkable, mixed use neighborhoods near employment and transit and that the proposed project does not meet this goal. This comment states one objective of the Housing Element.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.19

The commenter states the average rent for the project's one bedroom units would be greater than the monthly affordable rent for a family of moderate income. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.20

The commenter states that the County should require a project applicant to show feasibility of a project that requests a zone change, similar to the State density bonus law. This comment will be forwarded to

the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 41.21

The commenter references a letter from City of Los Angeles Councilman Bill Rosendahl that expresses concern regarding the project. The comment is not directed at the adequacy or content of the Draft EIR. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 41.22

The commenter urges the County to consider the impacts of the proposed project and offers to continue and meet with the project developer in hope to design the proposed project and reduce the environmental impacts. Since the Draft EIR was published, the project developer has revised the project. Please refer to the Recirculation Draft EIR Project Description section for details. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

May 9, 2010

Mr Anthony Curzi
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

1

Reagarding: Millennium Playa del Mar Apartment Project
County Project Number R2009-02015

Dear Mr. Curzi,

Our single family homes and school were built in the late 40's and 50's. Since then we have been invaded with all kinds of development:

The commercial, light industrial tract, the 309 Avalon Apts. the Home Depot, Investors Daily, Marina Ford, Chiat Day and many others to the West.

2

Playa Vista and its mammoth development to the South, and in the near future Phase 2 with 2600 townhouses, condos, along with shops, markets, etc.

3

The Marina Freeway with no noise barrier wall. Extreme noise with traffic and air pollution.

4

Jefferson Blvd. with six (6) lanes of traffic, noise and air pollution.

5

Centinela Ave. a sidetrack freeway North and South bound with speeding cars, trucks, motorcycles, 18 wheelers and no enforcement of the 35 mph speedlimit.

6

All this development has brought to our residential area is a massive headache of environmental issues that cause health risks. Which are:

7

More and more people

More heavy speeding traffic with no enforcement.

More extreme noise and vibrations from traffic.

More parking problems in our residential areas from businesses and apartments.

More poor air quality from exhaust fumes, dirt and dust.

More cut thru speeding traffic on our alleyways.

Additional use of water causing shortages.

Additional overuse of the sewer system.

Overcrowding schools.

Panic attack if disaster strikes with no emergency escape due to gridlock.

And lastly no more open space.

8

The proposed plan of the Millennium Playa del Mar Apartments, this huge oversized complex on the church property will bring and add too these existing overwhelming problems. It will impact our daily lives with additional stress both physically and mentally. And it is not in keeping with our quality of life in our residential area.

9

Anyone with common sense knows this apartment complex is too high at 60 feet and too large with 216 units plus the parking facility for this area. It will create havoc in many ways.

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The developers build the concrete and asphalt jungles, make the money, and we the neighborhood suffer the consequences.

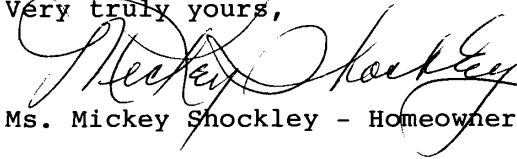
11

We the people who LIVE here oppose the request to change the zoning from R-1/R-3 to R-4. We say NO upzoning to R-4.

12

Please consider all the issues we bring to you as human beings impacted by developers.

Very truly yours,



Ms. Mickey Shockley - Homeowner and my Neighbors

13

12460 Lucile Street
Los Angeles, CA 90066

Tel 310-827-2728

Comment Letter No. 42

Mickey Shockley
12460 Lucile Street
Los Angeles, California 90066
Letter dated May 9, 2010

Comment 42.1

The commenter states the since the nearby single family homes and local school was constructed in the 1940's and 1950's, there has been an increase in different types of development. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.2

The commenter describes the type of recent development located to the west of the project site. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.3

The commenter describes the type of Play Vista development located to the south of the project site. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.4

The commenter states the Marina Freeway has no noise barrier wall and there is extreme noise with traffic and air pollution. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.5

The commenter states Jefferson Boulevard has six lanes of traffic with noise and air pollution. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.6

The commenter describes the type of traffic on Centinela Avenue. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.7

The commenter states the area development has created health risks. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.8

The commenter states the area development as described in the letter has created environmental issues relating to noise, traffic, parking, air quality, utilities, public services, and lack of open space. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.9

The commenter states the proposed project will add to the problems described in **Comment 42.7**.

This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.10

The commenter states the proposed project is too tall with too many units. Please refer to **Topical Response 1: Project Density and Land Use Compatibility**, **Topical Response 2: Traffic and Access**, and **Topical Response 3: Project Design and Height**, for additional information.

Comment 42.11

The commenter expresses general displeasure with development in general. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.12

The commenter expresses opposition to the proposed zone change. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 42.13

The commenter provides their contact information. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

THE LAW OFFICE OF
WAYNE AVRASHOW

16133 VENTURA BLVD. SUITE 920
ENCINO, CALIFORNIA 91436-2413
TEL: (818) 995-1100 • FAX: (818) 995-4801
E-MAIL: walaw@sbcglobal.net
www.walawpro.com

May 17, 2010

Via e-mail & Overnight Mail

Ms. Mi Kim & Mr. Anthony Curzi
Department of Regional Planning
Los Angeles County
320 West Temple Street
Los Angeles, CA 90012

Re: R2009-02015/Millennium-Playa Del Mar Apartments (the "Project" or "Property")

Dear Ms. Kim & Mr. Curzi:

This office represents the ownership of the property at 12435 W. Jefferson Boulevard, commonly known as the Club Marina Apartments (the "Apartment"). This letter shall supplement the previously transmitted letter of April 28 in regards to the above referenced Project and the Draft Environmental Impact Report ("DEIR").

Disregard of Existing Ingress/Egress Creates Significant Environmental Impacts

The Project's high density scheme relies on a land plan to cram an R-4 density of 216 dwelling units and the 4.5 story, 433 parking space Garage onto the site, instead of an R-3 density with a manageable parking plan. The former/current Church at the Property has two existing points of ingress/egress on Grosvenor and Juniette which do not negatively impact the neighborhood (DEIR Figures 4.6-1 and 4.6-2.) Yet the Project's recycled and rejected site plan funnels 1,433 vehicle trips per day onto a narrow alleyway and adjacent to single family homes. A reconfigured land plan could utilize the existing Juniette and Grosvenor points of access to avoid numerous significant environmental impacts.

Noise Impacts of Project's Operation & Garage Not Adequately Analyzed in DEIR

The attached report from Menlo Scientific Acoustics, Inc., and its principal Neil Shaw, an acoustical engineer with more than 30 years of experience, confirms that the DEIR omits to include an analysis of many acoustical impacts, and for others fails to offer an adequate analysis which are created by the Project's operation and the Garage. Of course if an impact is not analyzed, mitigation measures are not proposed.

e:clubmar.county.5.17.10

Page 1 of 4

The DEIR confirms that the noise impact is significant, existing noise standards for, "Jefferson, between Grosvenor and Centinela," "Exceeds Standards." ("Interior Noise Impacts with Windows Open" Table 4.3-6). The DEIR suggests, "with closed windows and air conditioning in-place, interior noise standards would be achieved and no impact would occur." (4.3.6.3.1). In reliance on such, the DEIR concludes that there is "No Impact." (4.3.6.3.2).

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The facts do not support this conclusion since the Apartment does not have air conditioning. "No Impact" can only be achieved if the Apartment residents never open their windows; or the Apartment owners undertake the economic expense and needless environmental waste to retrofit the building for air conditioning to cool residences that heretofore were cooled by nature's ocean breezes.

Geo-technical Report Confirms Feasibility of Subterranean Parking

One manner of mitigating the many impacts from the Garage would be to relocate the parking to a combination of on-grade and subterranean parking. The feasibility of subterranean parking at the Project is confirmed by:

- a) Alternatives must be "feasible" and the feasibility of subterranean parking is confirmed by DEIR Alternative 4 which includes underground parking (DEIR 6.0-10).
- b) All of the three immediately adjacent apartment buildings fronting Jefferson Boulevard have underground parking.
- c) A geotechnical review of the Property confirms, "that construction of a 1-level subterranean basement (for parking) below the proposed apartments is feasible from a geotechnical viewpoint." (see attached report prepared by L. A. Private Eyes Geotechnical Engineers, dated May 7, 2010).

4

Zone Change to R-4 Adjacent to Single Family Homes Fails Burden of Proof

A zone change to R-3 is sustainable, however the Project's proposed zone change to R-4 fails to meet the County's required burdens of proof (Code §22.16.110).

§22.16.110 A. There are no "modified conditions" to the Property to warrant a zone change to R-4. The proposed use is a multi-family residential use, a "by-right" use in R-3. A zone change to R-3 for the entire Property for consistency with the General Plan is supportable, but there are no "modified conditions" to support a change to R-4.

§22.16.110 B. There is no "need" for the change, only a desire based on economic benefit. A zone change to R-3 is justifiable based on a "need" to be consistent with the General Plan.

§22.16.110 C. An apartment building in an R-3 zone and a height of 35' is the "proper location" adjacent to single family homes and apartments 2-4 stories in height.

§22.16.110 D. Based upon consistency with the General Plan this burden would be met if the zone change was to R-3. There is no justification for a change to R-

5

4 other than reliance on a sole clause in the County's General Plan of an, "unmet demand for housing," which is refuted by current, third party data from the USC/Marshall School of Business.

5

Traffic Impacts Not Fully Disclosed

An April 30, 2007 Memorandum authored by the Traffic engineer summarized a meeting with the City of Los Angeles (the "City") on behalf of the prior developer Archstone. On June 21, 2007 the City signed a Memorandum of Understanding ("MOU") based upon that Archstone's Project Trip Distribution (Figure 8 in Appendix A of the Traffic Study). However there is a revised Project's Trip Distribution from which the DEIR is based upon (Figure 4.5-4).

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The attached May 17, 2010 analysis from Overland Traffic Consultants Inc., its principal Jerry Overland has greater than 25 years of experience, details several inconsistencies between the two Distributions:

- * The MOU based upon the revised Project Trip Distribution is not signed.
- * The 2007 MOU and Archstone's Trip Distribution noted Bluff Creek Drive and several other streets as "future," since their completion are conditions of the Playa Vista development. It is uncertain if all "future" streets will be operational when the Project is occupied in 2013.

* The Project Distribution assumes 70% of the Project's traffic will turn left at Grosvenor and Jefferson. This may only occur if there is a traffic signal. However since that intersection is within the City's jurisdiction, the County cannot condition the Project's tentative map to require a City action.

7

* The Project's Trip Distribution assumes 100% of the traffic will enter and exit at Grosvenor. However since Centinela is an "on and off" ramp of the "90 Freeway," it will be closer for residents who use Centinela's off-ramp, to access the Project from the alleyway via Juniette than drive around the block to Grosvenor. This access is confirmed in the Traffic Study, "this alley is accessible from Juniette," (pages 3 and 47).

Since there is no written justification to reconcile the conflicts in traffic distribution between the two Distributions, the Traffic Study should be amended to; justify or explain the conflicts, and include an alternative traffic analysis if any of the following occur: the Grosvenor/Jefferson signal is not constructed, if the future streets are not constructed when the Project is occupied, and to fully address Juniette as a point of access.

Visual Impacts of Parking Garage to Apartment Residents Not Analyzed in DEIR

The DEIR did not include a study to fully analyze the Garage's visual impacts to the apartment residents to the south. Without a study, the DEIR concluded that, "shade impacts...are not considered significant" (4.6-21 and computer generated renderings in 4.6-9a). The two attached photographs from a west and east perspective in the alleyway demonstrates the close proximity of the alleyway to the adjacent apartment residences, and the potential of shade and shadow impacts to the Apartment.

8

Significant Impacts Not Fully Analyzed or Discussed Mandate Subsequent DEIR

A Subsequent DEIR is mandated if major changes are required to make an DEIR adequate (CEQA Guidelines §15162). Two examples are, "The project will have one or more significant effects not discussed," (§15162(3)(A)); and "Significant effects previously examined will be substantially more severe than shown..." (§15162(3)(B)). A Supplemental DEIR is appropriate if, "minor additions or changes would be necessary to make the previous DEIR adequate" (§15163 (a)). (underlined for clarity purposes).

9

We respectfully request that a Subsequent DEIR be prepared and re-circulated based upon the following:

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* The falsity of the Project Objectives as confirmed by the University of Southern California Marshall School of Business Report;

* The failure to explain why an Alternative with R-3 density was not presented;

11

* The omission to analyze the decreased air quality for the residents of the adjacent single family homes and apartment building from the revised access;

12

* The omission to analyze the visual impacts, and the non-responsive, "green screen," or "wire screen with vines," to mitigate that visual impact to adjacent residents;

13

* The omission to analyze the acoustic impacts from the Project's operations;

14

* The land plan's disregard of the existing access of Juniette and Grosvenor in favor of access abutting residents of single family homes and apartments;

15

* Resolution of the inconsistencies in the two Trip Distributions and the failure to include an alternative analysis.

Sincerely,



Wayne Avrashow, Esq.

WA/jk

Enclosures

16

cc: Clients

Los Angeles County Supervisor Mark-Ridley Thomas, Attn: Ms. Karly Katona

Los Angeles City Councilman Bill Rosendahl, Attn: Ms. Nancy Franco

Comment Letter No. 43

Wayne Avrashow
16133 Ventura Boulevard, Suite 920
Encino, California 91436
Letter dated May 17, 2010

Comment 43.1

The commenter represents the ownership of 12435 W. Jefferson Boulevard. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 43.2

Commenter states the project's 1,433 vehicle trips per day will funnel onto the alley and that a reconfigured site plan that utilizes the existing Juniette and Grosvenor points of access could avoid numerous environmental impacts. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the assertion that a reconfigured plan could avoid environmental impact related to traffic. The Draft EIR concluded that after mitigation, the proposed project would not create a significant impact related to traffic and access. With provision of a traffic signal at the intersection of Grosvenor Boulevard and Jefferson Boulevard, traffic in the project vicinity would be better regulated and would flow better.

Please refer to **Topical Response 2: Traffic and Access**, and the Recirculated Draft EIR Traffic and Access Section for additional information.

Comment 43.3

The commenter references an attached report from Menlo Scientific Acoustics, Inc. that asserts the Draft EIR omits an analysis of the project's many acoustical impacts and fails to adequately analyze the noise impacts from operation of the project and garage. The commenter claims the Draft EIR concludes there is a significant noise impact, exceeding thresholds of significance for "Jefferson, between Grosvenor and Centinela". The commenter asserts the Draft EIR states that with closed windows and air conditioning in place, interior noise standards would be achieved and no impact would occur. The commenter asserts this is not an adequate mitigation measure because the Club Marina apartments do not have air conditioning and no impacts could only be achieved in the apartment owners retrofit the building with air conditioning.

In Section 4.3, Noise, of the Draft EIR, existing conditions noise monitoring was conducted in multiple locations and noise modeling using anticipated traffic generation numbers for the proposed project was

done to assess the potential for operational noise impacts after project completion. Table 4.3-6, Interior Noise Impacts with Windows Open indicates that existing noise levels with open windows currently exceed the interior noise standards. Table 4.3-7, Operational Noise On-Site Impacts, indicates that exterior noise levels would increase as a result of traffic by less than 1.0 dB(A). It was determined in the noise impact analysis for the proposed project that temporary and sporadic significant and unavoidable noise impacts are anticipated to occur during construction of the proposed project. No feasible mitigation measure could be provided to reduce these significant impacts to less than significant levels during project construction. This comment states that the proposed project and its parking garage would result in creating “long-term significant noise and air quality impacts.” This opinion is not supported by any quantitative or qualitative data, and does not reflect the analysis and findings contained in the Draft EIR.

The Menlo Scientific Acoustics comments suggest that the Draft EIR failed to analyze construction and operational noise impacts. This is refuted by the Section 4.3, Noise, of the Draft EIR, which analyzed the construction noise impacts and concluded that it is a significant and unavoidable impact. Mitigation measures 4.3-1 through 4.3-4 are proposed to reduce the severity of construction noise impacts, but not to less than significant. The same Section 4.3, Noise, of the Draft EIR analyzed the operational noise impacts summarized in Table 4.3-7, Operational Noise On-Site Impacts, and concluded that operational noise is not a significant impact. In regard to operational noise impacts along the alley separating the project site from the apartment buildings along Jefferson Boulevard, there are currently more than 1,000 vehicle trips per day within the alley. However, the number of trips, inclusive of project egress trips, would likely decrease with the implementation of the traffic signal at Grosvenor and Jefferson Boulevard since the majority of the current alley vehicle trips will be removed. Please refer to **Topical Response 2: Traffic and Access** for discussion on alley trip reduction.

Reference to existing ambient noise levels on Jefferson Boulevard exceeding current County of Los Angeles standards and the use of air conditioners are specific to operational noise impact analysis for new residents who would move to the Millennium-Playa del Mar Apartments complex. Individuals living in the existing apartments along Jefferson Boulevard are already exposed to noise levels that exceed County noise standards.

Comment 43.4

No significant impact associated with the design of the proposed parking garage has been identified in the Draft EIR, or in this comment letter for any environmental topic at a project or cumulative level. Mitigation measures are only proposed to mitigate impacts that have been identified through quantitative or qualitative means. No quantitative and qualitative data identifying an impact associated

with the parking garage has been provided. Therefore, no mitigation measures are necessary to mitigate an impact that does not exist.

Please refer to **Topical Response 1: Project Density and Land Use Compatibility**, **Topical Response 2: Traffic and Access**, and **Topical Response 3: Project Design and Height**, for additional information.

Comment 43.5

For a detailed response in regards to density and land use compatibility, please refer to **Topical Response 1: Density and Land Use Compatibility**.

Section 4.1, Land Use and Planning, of the public Draft EIR assessed the potential impacts of the proposed project in regards to adopted planning regulations and found the proposed project would not result in a project or cumulative level significant and unavoidable impact.

Comment 43.6

The traffic study that assessed potential impacts of the proposed project was prepared in consultation with the Los Angeles Department of Transportation (LA DOT) and was approved by the County of Los Angeles Department of Public Works Traffic and Lighting Division (LACDPW). This consultation and approval included substantive review and agreement with existing conditions, trip credit, trip generation, trip distribution, future conditions, related projects, cumulative impacts, etc. assumptions used by RAJU Associates, Inc to conduct the analysis.

Please refer to **Topical Response 2: Traffic and Access** for further information.

Comment 43.7

Please refer to response to **Comment 43.6** above.

The comment by Overland Traffic Consultants, Inc. referencing an unsigned Memorandum of Understanding (MOU) implies unfamiliarity with the County of Los Angeles environmental review process. All information incorporated into a Draft EIR, including the technical reports accompanying the Draft EIR as appendices, are reviewed by County staff for their independent review and judgment. It is not until County staff is satisfied that the contents of the Draft EIR provide the decision makers with sufficient information to make an informed decision on the discretionary requests that a Draft EIR is released for public review. In addition, it is not clear to what the commenter claims is the "signed" MOU as compared to the "unsigned" MOU, as neither figure has a signature. The claimed "signed" MOU comes from an earlier traffic study by Raju Associates, Inc. that was revised in December 2009 under review of County of Los Angeles Traffic and Lighting Division for incorporation into the March 2010 Draft EIR. The "unsigned" MOU is a figure from the March 2010 Draft EIR, the source of which is the

December 2009 revised traffic report of Raju Associates, Inc. and reviewed and approved by the Traffic and Lighting Division.

Comment 43.8

Aesthetics, light, and glare were all assessed in details in the Draft EIR in Section 4.6 Visual Resources. Project and site-specific visual simulations were prepared for impact analysis. Additionally, shade and shadow simulations were prepared to assess the potential impacts to occur as a result of development of the proposed project. No shadows would be cast on the apartment buildings along Jefferson Boulevard because the proposed new building will be to the north of the existing structures. This analysis is found subsection 4.6.4.4, Project Analysis (Shade/Shadow).

The existing Club Marina apartment complex located directly across the southern alley to the south of the project site is approximately 49 feet tall from grade on Jefferson Boulevard and approximately 37 feet tall from grade directly adjacent to the alley. The proposed project will increase the width of the existing alley from 25 feet to 28 feet to create more distance between the proposed parking garage and existing Club Marina apartment complex. Further, the proposed parking garage will have a maximum height of 35 feet, which is 2 feet lower than the height of the existing Club Marina apartment complex that is across the existing alley adjacent to the project site on the southern boundary.

A total of 353 parking spaces (329 spaces in a parking garage, 20 parking spaces in private garages, and 4 on-grade parking spaces opposite the leasing office) would be provided as a part of the proposed project. The 329-space parking garage would have a maximum height of 35 feet and is proposed to be sealed on all sides and mechanically ventilated to reduce noise and vehicle emissions along the southern alley. The sealed parking garage will be designed with facades that resemble a multi-family residential structure so that it does not appear to be a parking garage. By sealing the proposed parking garage, providing an internal ventilation system, and adding architectural facades to the exterior, the potential for air quality, noise, and aesthetics impacts are avoided through project design features. Please refer to **Topical Response 3: Project Design and Height**, for additional information.

Comment 43.9

A Subsequent EIR and a Supplemental EIR can only prepared after a project has a certified Final EIR. No EIR has been certified for this proposed project at this time.

As described by *State CEQA Guidelines* Section 15124, project objectives were are included in the Draft EIR. The opinion that the project objectives were “conclusionary and based upon non-relevant information” has no basis in CEQA.

Comment 43.10

The project objectives identified by the project applicant in the project description of the Draft EIR are described by the commenter as “conclusionary and based upon non-relevant information.” The project objectives were identified by the project applicant and accepted by the County of Los Angeles Department of Regional Planning. California Administrative Code Title 14, *State CEQA Guidelines* Section 15124 Project Description states:

(b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

As described by *State CEQA Guidelines* Section 15124, project objectives were included in the Draft EIR. The opinion that the project objectives were “conclusionary and based upon non-relevant information” has no basis in CEQA.

The commenter states the claim that the project’s objective to provide needed housing is refuted by “third party expert studies” that do not find that there is a shortage of housing in Los Angeles County, or that there is a need for multi-family residential housing in Los Angeles County. This opinion stated by the commenter contradicts the information and findings contained in the adopted Los Angeles County Department of Regional Planning Housing Element from 2008.

As described by *State CEQA Guidelines* Section 15124, project objectives were included in the Draft EIR. The opinion that the project objectives were “conclusionary and based upon non-relevant information” has no basis in CEQA.

Comment 43.11

Section 15126.6 Consideration and Discussion of Alternatives to the Proposed Project states the following:

Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the

alternatives to be discussed other than the rule of reason. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553 and Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376).

Comment 43.12

Construction and operational air quality impacts anticipated to result from the proposed project were assessed in Section 4.4 Air Quality of the Draft EIR. On page 4.4-65 of the Draft EIR, it is stated that “VOC [Volatile Organic Compounds] emissions would exceed SCAQMD’s [South Coast Air Quality Management District’s] threshold of significance during 2012; therefore, construction of the proposed project would have a significant impact on air quality.” Table 4.4-15, Estimated Unmitigated Operational Emissions, indicates that the project impacts will not exceed the established thresholds.

Comment 43.13

Please refer to responses to **Comment 43.8** above.

Comment 43.14

Please refer to responses to **Comment 43.4** above.

Comment 43.15

Please refer to responses to **Comment 43.6** above.

Comment 43.16

Please refer to responses to **Comments 43.6** and **43.11** above.

MENLO SCIENTIFIC ACOUSTICS, INC.

120 NORTH TOPANGA CANYON BOULEVARD, SUITE 105
POST OFFICE BOX 1610, TOPANGA, CALIFORNIA 90290-1610
PHONE 310-455-2221 WWW.MENLOZONE.COM

17 May 2010

Mr. Wayne Avrashow
THE LAW OFFICE OF WAYNE AVRASHOW
16133 Ventura Boulevard, Suite 920
Encino, California 91436

Subject: Millennium-Playa Del Mar Apartments DEIR - Noise Review

Dear Mr. Avrashow;

We have reviewed the Draft Environmental Impact Report (DEIR) prepared for the proposed subject project as found on the Los Angeles County Planning Department website per your request.

The proposed project has five clusters of apartments containing a total of 216 dwelling units, one courtyard has a swimming pool, and an above ground parking structure for 433 cars at the southern part of the project. Our initial review has found there are some topics that are not adequately addressed in the DEIR, or in some cases, important acoustical impacts were entirely omitted from the analysis. These include:

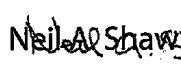
1. Nighttime noise levels.
2. The character of sounds that will be generated by the project, including, but not limited to, resident entry and exit, mechanical systems and exhaust systems, and activities related to trash pickup.
3. Noise levels from common area activities.
4. There is no discussion in the DEIR of the noise impacts from the project's operational phase.

These and other items are presented in Appendix 1, Discussion of Major Deficiencies in DEIR, below. My margin notes from the DEIR review are presented in Appendix 2, Margin Notes from DEIR Review. A brief resume, as you requested, follows Appendix 2.

Please contact me at your convenience if you have any questions or comments.

Sincerely,

Menlo Scientific Acoustic, Inc.


Digitally signed by Neil A. Shaw
DN: cn=Neil A. Shaw, email=info@menlozone.com, o=Menlo Scientific Acoustics, Inc., c=US
Date: 2010.05.17 11:31:26 -0700

Neil A. Shaw, FASA, FAES

NAS:sk

attachment

1

MENLO SCIENTIFIC ACOUSTICS, INC.

Appendix 1 - Discussion of Major Deficiencies in DEIR

1. The findings presented in the DEIR are selective and in many cases may not be indicative of the actual impact project generated noise will have on the surrounding residential areas.

For example, there is no analysis of or discussion in the DEIR of HVAC equipment noise, parking lot activities directly across and on the same level as apartment units on the south side of the south alley, trash pickup, or common area activities..

2

2. Several metrics are used in the DEIR to describe the operational noise impact, including L_{eq} and CNEL. They are not equivalent.

They are used interchangeably in the report and they do not describe or characterize the intermittent nature of the various noises from many of the activities that will be produced by the proposed project and how these may interfere with sleep and other activities in the affected neighboring residences.

3

3. In many cases CNEL limits are described, but this metric is for transportation noise. In other cases L_{eq} is used. These are single number metrics, that in the former case, is the average of the hourly noise levels (an L_{eq} for a time span of one hour) over a twenty-four hour period with penalties added during the evening and nighttime hours, while the latter represents a constant level sound over the measurement period that has the same energy as the time varying signal during the measurement period (which in many instances is not specified in the DEIR).

4

Both metrics smooth out the fluctuations in sound level that occurs and so do not adequately describe the impulsive, intermittent, and/or spectral qualities of the noises that will emanate from the proposed project.

The annoyance of audible sounds that will emanate from the project's many sources, such as automobiles starting and car doors slamming, music from automobiles and resident activities, especially the preponderance of bass sounds, is not discussed in the DEIR nor is the disturbing nature of the noise from the parking lot and other activities during the evening and night times.

5

The DEIR does not discuss these impulsive or intrusive noises, defined in sections 12.08.190 and 12.08.210, respectively, of the County Code, and their impacts. The DEIR does not address or describe mitigation for these types of noises generated by the project and how the proposed project will be in compliance with the code, especially for the dwelling units in the existing residences that face the project.

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4. The Los Angeles County Code, Title 12, Environmental Protection, Chapter 12.08, Noise Control, section 12.08.390 - Exterior Noise Standards, quoted in the DEIR on page 4.3-9, states the L_{eq} level that cannot be exceeded in an hour, and that which cannot be exceeded 50%, 25%, 8..3%, and 1.7% of the time in any hour, as well as the maximum level that cannot be exceeded in an hour. These limits are different for daytime hours, 7 AM to 10 PM, and for nighttime hours, 10 PM to 7 AM.

7

The DEIR appears to only discuss noise intrusion for the daytime hours. Further, the DEIR applies the daytime maximum level for all hours of the day.

5. The noise impact due to the "canyon effect" (in which sound does not dissipate, but is contained

8

MENLO SCIENTIFIC ACOUSTICS, INC.

between, and persists within, the exterior walls of the two buildings) from the proposed parking structure coupled with the increased traffic on the south alley is not discussed nor is the impact on the residences to the south. Both are ignored.

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6. There is no description of the building heating, ventilation and air conditioning mechanical systems and the impact these will have on the neighboring residences.

Will this equipment be roof-mounted or through-wall equipment for each dwelling unit? How will this equipment operation effect the residences to the south?

9

As most of the residences to the south do not have air-conditioning, the DEIR fails to address that the windows to these units will be open, and the DEIR also fails to address the unmitigated impact of the noises generated by the project on these apartment residences.

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Appendix 2 - Margin Notes from DEIR Review

¶2.5	There is no discussion of operational phase noise or operational phase noise impact.	10
Table 2.0-1	Operational noise impacts are not listed in section 4.3 of the table. Traffic related noise is not listed in section 4.5 of the table. Noise is not mentioned in section 5.0 of the table.	11
Figure 3.0-2	No note of canyon effect between Courts 1, 2, and 5 and existing buildings to south. No note of open courtyards at Courts 3 and 4 facing residences to the north.	12
Figure 3.0-3	No note that the parking structure is essentially open to buildings to the south - and there will be essentially no attenuation of sound from structure to buildings.	13
¶3.4.1.3	No mention of increased traffic in alleys accessing parking.	14
¶4.1.4.4.1.1	Only mentions construction phase noise, no mention of operational phase noise generation or impact.	15
¶4.3.1	"This section also describes potential noise impacts that would occur as a result of project construction and <u>operation</u> ." Then goes on to talk, in general, only about existing traffic noise.	16
Table 4.3-1	Does not specify distance from source to window.	17
Figure 4.3-2	Where are barriers from parking garage (source) to windows (receivers) on opposite side of alley?	18
Table 4.3.4	Why no nighttime levels?	19
¶4.3.5 Table 4.3-4	Measurement was made on a Friday, the heaviest traffic day of the week. Report states that the maximum L_{eq} measured was used. Was this a 24 hour survey? What about minimum L_{eq} ? Using this to determine the ambient <u>may</u> be valid only for the 7 AM to 10 PM period. Where is the histogram per 12.08.390? Where are the L_n levels? How were levels extrapolated? Why no nighttime calculations?	20
Table 4.3-5	There is no data and there are no calculations for the south or north ally, especially in the middle of each.	21
¶4.3.6.3.1	Project may be air-conditioned, but the residences to the north and the south of the project may not be. In the case of the residences to the south of the parking lot, the multi-story lot presents noise sources that can be about 30 feet distant. With the canyon effect due to the structure, noises generated in the structure may not be attenuated. Also, exterior noise levels limits are at the property line, and so will be even greater than those that may be experienced at a residence.	22
Table 4.3-7	Only traffic noise is presented. No parking lot noises, HVAC, common area events, etc.	23

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- ¶4.3.6.5 No data is presented regarding levels generated by parking activities (see for example Parking Lot Noise Sources at 100 Feet from Gordon Bricken & Associates, 1996, cited in Trancas Canyon Community Park, EIR, 2008). Intermittent and impulsive nature of these activities is not discussed. Sources in parking structure will be in direct line of sight, in many case with no horizontal or vertical offset, and no barrier between source and receiver. Although many activities will take place during Am and PM peak periods, many will occur at other times, especially at night and in the early morning hours.
- ¶4.3.6.6 Periodic increase in noise due to peak AM and PM traffic along the northern and southern alleys, in and around the parking structure, and that due to trash pickup is not discussed or addressed.
- ¶4.3.7 HVAC noise impacts, especially during the night and early morning is not discussed or addressed.
- ¶4.3.8 DEIR states "Operational noise impacts are not considered significant." Without investigation of HVAC, parking activities, common area activities, among other items, this statement may not be accurate.

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- END OF REPORT -

MENLO SCIENTIFIC ACOUSTICS, INC.

Abbreviated Resume: Neil A. Shaw

Fellow	Acoustical Society of America (ASA)
Fellow	Audio Engineering Society (AES)
Senior Member	Institute of Electrical and Electronics Engineers (IEEE)
Member	Institute of Noise Control Engineering (INCE)
Member	Society of Motion Picture and Television Engineers (SMPTE)
Principal	Menlo Scientific Acoustics, Inc., 1992 -
Senior Associate	Western Electro-Acoustic Laboratory, 1975 - 1992 (final position)
Research Engineer	University of California, Los Angeles, School of Engineering, Department of Mechanics and Aerospace Engineering, 1977 - 1984
Adjunct Professor	University of Southern California, Thornton School of Music, 2008 -
BS Engineering	University of California, Los Angeles, 1977
MS Engineering	University of California, Los Angeles, 1977
Kenward S. Oliphant	Memorial Fellowship in Acoustical Engineering Consulting Engineers Association of California, 1982

Comment Letter No. 43A

Neil A. Shaw
Menlo Scientific Acoustics, Inc.
120 North Topanga Canyon Boulevard, Suite 105
Topanga, California 90290
Letter dated May 17, 2010

Comment 43A.1

This comment summarizes aspects of the Draft EIR noise analysis that are considered to be deficient or not adequately addressed. The commenter's more detailed critique of the Draft EIR noise analysis is contained in two appendices attached to his comment letter and is indicated below. These comments concern nighttime noise, common area noise, and operational noise.

Section 4.3, Noise, of the Draft EIR analyzes both construction and operational noise impacts and concludes that the project construction noise impacts are unavoidably significant, but operational noise impacts are not considered significant. Further details on these topics are discussed in the responses below.

Comment 43A.2

This comment asserts that the Draft EIR findings are selective and may not indicate the level of noise impact the project may have on neighboring residences. In addition, this comment claims that heating-ventilating and air conditioning (HVAC) equipment were not part of the noise analysis.

The Section 4.3, Noise, of the Draft EIR analyzed the operational noise impacts summarized in Table 4.3-7 Operational Noise On-Site Impacts and concluded that operational noise is not a significant impact. This analysis included discussion of potential noise impacts to adjacent residences. Because the HVAC equipment will be roof mounted and will include sound attenuation barriers this noise would be less than significant.

Comment 43A.3

This comment asserts that the noise analysis interchangeably used L_{eq} and CNEL. These terms, Equivalent Noise Level (L_{eq}) and Community Noise Equivalent Level (CNEL) respectively, are defined in subsection 4.3.2, Characteristics of Noise, of the Draft EIR within in subsections 4.3.2.1, Equivalent Noise Level, and 4.3.2.2, Community Noise Equivalent Level, respectively, and are not used interchangeably; for example, see Table 4.3-8 Future Operational Noise On-Site Impacts where both terms are used and are calculated differently.

Comment 43A.4

This comment provides definitions of the terms L_{eq} and CNEL and describes how each are used. The comment does not state a specific concern or question regarding the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required. The comment is acknowledged and will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 43A.5

This comment claims the audible sounds that would emanate from the proposed project are not discussed in the Draft EIR. This claim is not correct because the operational noise impacts from the project are analyzed in subsection 4.3.6.5, Impact Analysis, Threshold 3 in the Draft EIR clearly described the following: "Noise generated within the proposed parking structure would include tires squealing, car alarms sounding, car stereos, and horns honking. These sources could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively." The analysis further concludes that these impacts would be less than significant.

Comment 43A.6

This comment claims that the Draft EIR does not discuss "impulsive" and "intrusive" noises as part of the noise impact analysis. County of Los Angeles Environmental Protection Code 12.08.190 and 12.08.210, respectively, define "impulsive" noise as "a sound of short duration, usually less than one second and of high intensity, with an abrupt onset and rapid decay" and "intrusive" noise as "offensive noise which intrudes over and above the existing ambient noise at the receptor property." Subsection 4.3.6.5, Impact Analysis, Threshold 3 in the Draft EIR include mention of horn honking (impulsive) and vehicles traveling within the parking structure or along the alleyway (intrusive) and considered in the noise impact analysis.

Comment 43A.7

This comment claims that only daytime noise impacts were addressed in the Draft EIR. The daytime noise levels are used because they are the loudest and have the potential for causing the greatest impact. Nighttime noise is considerably softer and is less prominent. Using the daytime noise levels provides the most conservative impact analysis.

Comment 43A.8

This comment claims that the Draft EIR does not discuss the "canyon effect," which is defined in the comment as a sound that does not dissipate. It is not known how a sound could not dissipate but even sound that may echo off parallel walls would decrease with each successive deflection off a wall. The

traffic noise currently along the alley is an existing noise source and this traffic will decrease with project implementation, reducing the current noise levels along the alleyway. Please refer to **Topical Response 2: Traffic and Access** for discussion on the reduction of traffic along the alley.

Comment 43A.9

This comment states that there is no description of the building heating, ventilation and air conditioning mechanical systems, with no analysis of impacts on the neighboring residences. This comment is correct that no specific description of the HVAC equipment was included in the Section 3.0 Project Description. The project will make use of roof-mounted HVAC equipment with noise attenuation barriers surrounding the equipment as is common with current construction standards. With the roof-mounted equipment setback from the edge of the building, no direct noise levels exceeding the County noise standards would occur.

Comment 43A.10

This comment states that in Section 2.5 of the Draft EIR that discussion of operational noise was absent. This statement is correct because Section 2.5 is issues to be resolved/areas of controversy. Because the Draft EIR noise analysis concludes that project operational noise is less than significant, this is not an issue to be resolved or an area of controversy.

Comment 43A.11

This comment states that Table 2.0-1, Summary of Project Impacts of the Draft EIR does not list operational noise impacts under Section 4.3 of the table and traffic-related noise impacts under Section 4.5 of the table. The comment also states that noise is not mentioned in Section 5.0 of the same table.

This statement is correct because the Draft EIR concludes that operational noise impact to be less than significant and therefore would not require mitigation, which is the purpose of Table 2.0-1. Traffic-related noise impacts, which are less than significant for this project, would not be discussed under Section 4.5 because that section analyzes impacts associated with traffic, not the secondary impacts associated from operation of vehicles such as noise. All impact associated with noise are analyzed within Section 4.3 Noise of the Draft EIR. Section 5.0, Effects Found Not To Be Significant, would not contain noise because construction noise impacts are concluded to be a temporary significant impact.

Comment 43A.12

This comment states that the Figure 3.0-2, Playa del Mar Site Plan, makes no note of “canyon effect” (which is not defined) between Courts 1, 2, and 5. This statement is correct because “canyon effect,” which this commenter associated with noise effects, is not part of the project site plan. Noise analysis is contained in Section 4.3, Noise of the Draft EIR.

Comment 43A.13

This comment states that Figure 3.0-3, Building Elevations: South and North, makes no note that the parking structure is essentially open to buildings to the south with essentially no attenuation for sound. This statement is correct because Figure 3.0-3 provides visual information of the conceptual building design and therefore, no note would be expected. However, the project design has been changed in the Recirculated Draft EIR and the parking structure is no longer an open structure but a closed building now providing noise attenuation to the apartment buildings to the south.

Comment 43A.14

This comment states that subsection 3.4.1.3 does not mention that the project will increase traffic in alley in accessing parking structure. This statement is correct because there is no subsection 3.4.1.3 in the Draft EIR. Please refer to **Topical Response 2: Traffic and Access** for discussion on the reduction of traffic along the alley with project implementation.

Comment 43A.15

This comment states that subsection 4.1.4.4.1.1, Land Use Designation, of the Draft EIR only mentions construction phase noise and does no mention operational phase noise as an impact. This statement is not correct because this is the Land Use and Planning section of the Draft EIR and noise, construction or operational, is not mentioned at all in the section.

Comment 43A.16

This comment quotes “This section describes potential noise impacts that would occur as a result of project construction and operation” from subsection 4.3.1, Introduction, of the Draft EIR and states that only existing traffic noise is discussed. This statement is correct because subsection 4.3.1, Introduction, contains only introductory information. The analysis of project noise impacts is found in Section 4.3.6 Project Impacts, within which both construction and operational noise impacts are assessed.

Comment 43A.17

This comment states that Table 4.3-1 of the Draft EIR does not specify distance from noise source to apartment window. This statement is correct because Table 4.3-1 Outside to Inside Noise Attenuation is a general list of a variety of building types and comparing the noise attenuation of the construction materials, which is independent of the distance from the noise source.

Comment 43A.18

This comment asks why barriers from parking garage (source) to windows (receivers) are on opposite side of alley in Figure 4.3-2 of Section 4.3, Noise, of the Draft EIR. The question of why barriers in Figure 4.3-2 Noise Attenuation by Barriers is not valid because this figure is for general demonstration only and

does refer to the project design. Its reference in the Draft EIR is the following: “Manmade or natural barriers can attenuate sound levels, as illustrated in Figure 4.3-2, Noise Attenuation by Barriers.”

The comment does not state a specific concern or question regarding the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 43A.19

This comment asks why Table 4.3-4 in the Draft EIR does not indicate nighttime noise levels. Only daytime noise levels are included in Table 4.3-4, Existing Noise Levels, because the table summarizes the data collected from 24 hour noise monitoring and reflect the highest noise levels. Nighttime noise is considerably lower in volume and would not represent a worst case analysis.

Comment 43A.20

This comment asks if the maximum L_{eq} measured in subsection 4.3.5 of the Draft EIR was a 24-hour survey and what was the L_{eq} minimum level. The comment also asks about the use of a histogram for the noise evaluation. The L_{eq} listed in subsection 4.3.5 was calculated using data collected from a 24-hour survey. The minimum L_{eq} level was not included because it just one of many data sources used to calculate the L_{eq} . The maximum L_{eq} is used because it represents a worst case analysis. The comment’s reference to histograms in Chapter 12.08.390 Exterior noise standards—Citations for violations authorized when of the County of Los Angeles Environmental Protection Code is not a requirement except when verifying a violation of the noise section of the County Code.

Comment 43A.21

This comment states that Table 4.3-5 of the Draft EIR contains no data or the calculations for the results presented. This statement is correct because the use of a table within an environmental document typically summarizes the results from an analysis of data. In case of Table 4.3-5, the data information is contained in Appendix 4.3 of the Draft EIR.

Comment 43A.22

This comment states that although the proposed project may be air-conditioned, the residences to the north and the south may not be air conditioned. The comment claims that the canyon effect may prevent project noises from being attenuated. The comment also states that exterior noise levels will be greater at the property line than experienced at a residence.

The comment does not state a specific concern or question regarding the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required. The

comment is acknowledged and will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 43A.23

This comment states that Table 4.3-7, Operational Noise On-Site Impacts, of the Draft EIR presents only traffic noise and noise from parking lot, HVAC, common area events, are not considered.

This statement is correct that Table 4.3-7, Operational Noise On-Site Impacts, does not include certain operational noise impacts specifically because this table depicts the results from modeling roadway noise, which is the most prominent noise source in the project vicinity.

Comment 43A.24

This comment states that subsection 4.3.6.5 of the Draft EIR does not present parking activities noise in the noise analysis.

This comment is not accurate. Section 4.3, Noise, of the Draft EIR does consider noise generated within the proposed parking structure. Page 4.3-19 states "Noise generated within the proposed parking structure would include tires squealing, car alarms sounding, car stereos and horns honking. These sources could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively." The Draft EIR concludes that noise impacts attributable to noise generated by vehicles traveling within the parking structure is less than significant because the noise would be temporary and periodic and occur most intensely during the AM and PM peak periods.

Comment 43A.25

This comment states that subsection 4.3.6.6 of the Draft EIR that periodic noise increase resulting peak traffic along the access driveways was not addressed.

This statement is correct that subsection 4.3.6.6 does not include the operational noise of traffic along the access driveways because the section analyzed temporary and periodic noise impacts associated with construction activities. The project-related traffic using the access driveway would be an ongoing noise source and not temporary.

Comment 43A.26

This comment states that subsection 4.3.7, of the Draft EIR does not discuss HVAC noise impacts, during the night or day. This statement is accurate. Subsection 4.3.7, Cumulative Impacts, discusses the cumulative noise impacts associated with the primary source of noise in the project area, roadway noise from vehicle traffic. This noise associated with HVAC is a minor component of the overall ambient noise and would not contribute perceptible noise to these cumulative impacts.

Comment 43A.27

This comment repeats that subsection 4.3.8 of the Draft EIR states “Operational noise impacts are not considered significant.” This commenter questions that conclusion without investigation of the HVAC, parking activities, common area activities. This comment concerns the summary conclusion found in subsection 4.3.8, Level of Significance After Mitigation. Because operational noise impacts are found to be less than significant under subsection 4.3.6, Project Impacts, where noise associated with operational noise sources such as parking activities, then the conclusion in subsection 4.3.8 of less than significant is consistent with the Draft EIR analysis. Please refer to response to **Comment 43A.24** above.

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May 7, 2010
 Job No. 04SB10(R)

**Subject: Limited Geotechnical Review to Assess the Impact of The
 Proposed Millennium-Playa Del Mar Apartments & Parking
 Structure, 5550 Grosvenor Boulevard, Lots 1 & 2, Tract 33003
 On Marina Club Apartments at 12435 Jefferson Blvd.
Los Angeles County, California**

Dear Mr. Avrashow:

This letter report has been prepared to present our opinions regarding the feasibility of building subterranean levels below the proposed Millennium-Playa del Mar Apartments and Parking Structure considering the shallow groundwater conditions at the site. We were also to perform a preliminary evaluation of the EIR prepared for the proposed development and comment on the geotechnically- and construction-related issues that could affect your client's property, Marina Club Apartments, located at 12435 Jefferson Boulevard (to the south of the proposed development). As part of our evaluation, we visited the site on April 21, 2010. Marina Club Apartments consist of a three-story wood-framed structure underlain by a 1-level (10-foot deep) subterranean level basement garage. The structure is supported on conventional foundations. Water intrusion was not noted in the subterranean garage of Marina Club Apartments during our visit.

In Sum, it is our opinion that construction of a 1-level subterranean basement below the proposed apartments is feasible from a geotechnical viewpoint.

PROPOSED CONSTRUCTION

The site of the proposed development consists of a 4.93 acre parcel which is currently occupied by a tall church building and adjacent surface parking. The church has a 1-level subterranean parking garage as well and is supported on conventional foundations; the basement is at El. +10. According to the Geotechnical report included in the EIR, the existing site grades range from Elevation (El.) +16 to +26 (a 10-foot difference); the final site grades will be at El. 19. A letter dated April 7, 2008 from Group Delta (GDC), the geotechnical consultant of record for the project, states that the finished grades for the parking structure will be at El. +9 which implies

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that there is room for a 10-foot deep 1-level basement underneath. GDC encountered water table in one of their borings at El. +8.5 while past investigators encountered water at EL. 0.0.

Due to the compressible nature of the soft clayey layers below the proposed Apartments and Parking Structure to be supported on 52-foot long piles that tip into a sand layer at about El. 27. When dealing with shallow groundwater condition, structures are normally supported by driven piles. However, in order to reduce the impact of noise and vibration on the surrounding structures, GDC recommended 16-inch diameter Auger pressure Grouted Displacement (APGD) piles to be used. Normal drilled piles cannot be used due to potential caving of soils into the pile excavation.

2

APGD piles are installed by drilling down to the design depth and pumping concrete through the hollow stem of the auger down at the tip of the pile to displacing the mixture of soil and water. After building enough pressure, the auger is pulled up a foot and the process is repeated until the hole is backfilled with concrete. The proposed piles drive most of their capacity from end bearing into the dense sand layer at El. -27.

FEASIBILITY OF BASEMENT CONSTRUCTION

As stated by DGC in their 2008 letter and based on the proposed site grades, and depth to groundwater, as well as lack of water intrusion into the subterranean garage of Marina Club Apartments, it is our opinion that construction of a 1-level subterranean basement below the proposed apartments is feasible from a geotechnical viewpoint. Such construction will reduce the pile lengths and also reduce the potential for settlement of the proposed structures as excavations for the basement will unload the subgrade soils lessening the impact of the proposed buildings

3

GEOTECHNICAL & CONSTRUCTION ISSUES

The proposed piles are to tip out at about El. -33 in order to develop the design capacity. The explorations by DGC did not extend below this point; as such, it is not clear how thick is the dense sand layer that was encountered at El. 27. If this layer is underlain by soft clayey soils below it, there is a potential for excessive settlement of the proposed structures. To better quantify the thickness of the dense sand layers at depth, we recommend additional field explorations that extend well past the pile tip elevations to be performed.

4

The proposed piles drive most of their capacity from end bearing resistance into the dense sands. For proper load transfer to occur between the end bearing piles and the end bearing layer, usually the bottom of the pile exactions are cleaned of loose debris. With APGD piles, the bottom of the pile hole cannot be cleaned as it extends below the groundwater. In addition, if the auger is pulled up faster than the concrete is pumped into the pile excavation, pockets of soil can get trapped into the side of the pile reducing its capacity. To make sure this does not happen, each pile is to be tested by installing a tube in the middle of it to allow impact testing for proper wave

propagation. GDC states that APGD piles have been used on many projects in the vicinity of the site; however, those projects may have been smaller in scale than the Millennium-Playa del Mar.

Installation of APGD piles is difficult and must be done by contractors that are experienced with such installation. Before start of construction, a pile load test program has been proposed to verify whether or not the APGD piles can support the design loads as anticipated. What is missing from the GDC report is the measures that are to be undertaken in case the test piles do not support the designed loads with the normally industry accepted factor of safety of 2. Due to the above noted considerations, if the piles cannot support the design loads, the entire foundation system that is proposed for support of the proposed structures should be modified by adding more piles.

4

This redesign will lengthen the construction schedule which in our opinion was set optimistically too short to begin with. Even though the drilling equipment used to install the proposed APGD piles is quieter than pile driving hammers, they along with the rest of the large construction equipment used to demolish the existing church building and hauling trucks used to grade the site will create significant noise and dust which will be disturbing to the tenants of the Marina Club Apartments.

Normally developers perform a video and photographic survey of the exterior as well as the interior of the existing nearby structures before start of construction. The purpose of this documentation is to catalog a list of the existing damage to be compared to any new damage due to the proposed construction. In addition to the video and photograph cataloging, a vibration monitoring program should be undertaken by the developer to make sure construction vibrations do not cause any damage to the existing buildings.

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We also question the potential for differential settlement between the non-pile supported auxiliary walls, stairs, walkways, and utilities that connect to the proposed buildings. Due to the soft nature of the underlying clayey soils as well as liquefaction of the loose sands in case of a large magnitude earthquake, these improvements could experience significant damage.

Should you have any questions regarding the contents of this report, please call us.

Respectfully Submitted,

L.A. PRIVATE EYES GEOTECHNICAL ENGINEERS,
A DIVISION OF PRESTIGE ENGINEERING, INC.



Ebrahim Abe Simantob, P.E., G.E.
Civil & Geotechnical Engineer

L.A. Private Eyes Geotechnical Engineers

A Division of Prestige Engineering, Inc.

Comment Letter No. 43B

Ebrahim Abe Simantob
L.A. Private Eyes Geotechnical Engineers
1373 Westwood Boulevard, Suite A
Los Angeles, California 90024
Letter dated May 7, 2010

Comment 43B.1

This comment summarizes the conclusion of this comment letter that subterranean parking is geotechnically feasible.

This comment is introductory in nature and is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 43B.2

This comment summarizes the information contained in the Group Delta letter to Archstone-Smith dated April 7, 2008 and background of the proposed Auger Pressure Grouted Displacement (APGD) piles to support the foundation of the proposed apartment building.

This comment is noted, which is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required. It should be noted that the referenced April 7, 2008 Group Delta letter applies to a project design of a different developer who contemplated subterranean parking.

Comment 43B.3

This comment concurs with the conclusion of Group Delta in their April 7, 2008 letter to Archstone-Smith that subterranean parking is geotechnically feasible.

This comment is noted and will be forwarded to the decision makers for consideration during their deliberations on the proposed project. It should be noted that the referenced April 7, 2008 Group Delta letter applies to a project design of a different developer who contemplated subterranean parking.

While subterranean parking may be geotechnically feasible, the associated construction impacts would likely be greater than the proposed project and the amount of excavated material, which would need to be exported off-site, increasing construction traffic on surface streets and exacerbating construction air quality impacts. These impacts associated with subterranean parking are described under Alternative 4 within Section 6.0, Alternatives in the Draft EIR. This comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 43B.4

This comment describes the APGD type piles to be installed in the construction of the proposed apartment building. The comment concludes that more piles than initially stated may be required resulting in increased construction time.

This comment is noted. It is acknowledged in Section 4.3, Noise, of the EIR that construction noise may temporarily exceed the county noise standards during construction. It is also acknowledged that the length of construction activities provided in the Section 3.0, Project Description, is an estimate determined by using the best information available at the time of EIR preparation. This comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 43B.5

This comment recommends the use of a construction vibration monitoring program to prevent potential damage to neighboring structures as a consequence of construction activities. This comment also suggests the project use earthquake safe construction practices.

It is important to note that the use of APGD piles was specifically selected for this project to mitigate construction noise, vibrations and excess spoils for pile installation. The APGD pile system is very low noise and vibration which considered against driven piles. APDG piles are considered to also be low impact when considered against excess soils and drilling mud created by drilled piles which require additional truck to export the excess materials. A pre-construction survey of existing conditions and distress with photographic documentation and notation will be implemented prior to pile installation.

This comment is noted. The project apartment structures will be constructed to the earthquake safety standards required at the time of building permit issuance. This comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.



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May 17, 2010

Mr. Wayne Avrashow, Esq.
 The Law Offices of Wayne Avrashow
 16133 Ventura Blvd. Suite 920
 Encino, CA 91436

RE: Evaluation of Millennium Playa del Mar Apartments Traffic Study
 (Draft Environmental Impact Report, March 2010; SCH 2006101104)

Dear Mr. Avrashow,

As requested, Overland Traffic Consultants has conducted a review of the traffic analysis contained in the Draft Environmental Impact Report for the Millennium Playa del Mar Apartments prepared by RAJU Associates dated December 2009.

The analysis conducted for the DEIR traffic study is a comprehensive analysis, however several inconsistencies have been found that if modified would change the findings of the DEIR traffic study. Without additional information, clarification and/or correction of the issues presented below, the DEIR lacks the information necessary to determine the significance of the traffic impacts to the study area and site access. A good faith effort at full disclosure of the issues raised below is necessary.

City of Los Angeles Traffic Study Guidelines

The traffic study states that the analysis follows the City of Los Angeles Department of Transportation (LADOT) guidelines and procedures. However, information contained in the study is not consistent with several of the City of Los Angeles guidelines and procedures. If exceptions to the guidelines and/or procedures have been granted for the preparation of the project traffic study, the justification for those exceptions should be included in the report.

1. The signed scoping document with the City of Los Angeles Department of Transportation (i.e., Memorandum of Understanding provided in Appendix A of the Traffic Study) contains a different project distribution than that used in the DEIR traffic impact analysis (attached are the two project distributions).
 - a. The differences are substantial in that the LADOT distribution correctly assumes that the intersection of Grosvenor Boulevard and Jefferson Boulevard is not signalized, Bluff Creek Drive is not fully constructed to Lincoln Boulevard and that project access will utilize Juniette Street, Westlawn Avenue and Grosvenor Boulevard.
 - b. The project distribution used in the DEIR traffic impact assumes that the Bluff Creek Drive is fully constructed to Lincoln Boulevard and that all project access is from Grosvenor Boulevard even though a traffic

A Traffic Engineering and Transportation Planning Consulting Services Company



signal does not exist and left-turn access operates at LOS F, page 36 of traffic study.

- c. Traffic impacts at several study locations would change using the LADOT project distribution. Those intersections are: Juniette Street and Centinela Avenue, Westlawn Avenue and Jefferson Boulevard, Centinela Avenue and Jefferson Boulevard, Jefferson Boulevard and Lincoln Boulevard, and Grosvenor Avenue and Jefferson Boulevard. These intersections should be re-evaluated using the LADOT distribution or fully disclose why the LADOT distribution was not used and changed in the DEIR.
2. The future cumulative traffic analysis assumes roadway capacity improvements implemented by Playa Vista. Typically the City of Los Angeles does not allow the calculation of project traffic impacts to include roadway improvements by others. The reason is because the project has no control over the implementation of roadway improvements by others. If the improvements have not been implemented by the time the project is occupied then the project traffic impacts have been under reported in the DEIR. An analysis of the project traffic impacts should be presented without the Playa Vista improvements to fully disclose the potential significant traffic impacts created by the project.

Site Access

1. The project access is described as having access to and from Juniette Street via the southerly alley (traffic study pages 3 and 47). The site plan shows the southerly alleyway connecting to Juniette Street via a connecting north-south alley near the east end of the property. The DEIR traffic study does not show or analyze project traffic to and from Juniette Street. Therefore it is not clear if access to the site is allowed from the intersection of Centinela Avenue and Juniette Street.
2. If Juniette Street is not to be used for site access, an analysis of Juniette Street access should be included as part of the Alternative Project analysis.
3. If Juniette Street is to be used for site access, the traffic study needs to be revised.

A Traffic Engineering and Transportation Planning Consulting Services Company



Traffic Mitigation

1. The recommended traffic mitigation is a traffic signal at the intersection of Grosvenor Avenue and Jefferson Boulevard, but the City of Los Angeles has to authorize the installation. The DIER does not contain an authorization for the new traffic signal. Alternative or substitute traffic mitigation or an alternative site access scheme should be provided in the event the traffic signal is not authorized by the City of Los Angeles.
2. If 100% of the project traffic is not utilizing the Grosvenor Avenue and Jefferson Boulevard intersection then the traffic signal warrant analysis presented in the traffic study overstates the peak hour traffic and the traffic signal may not be warranted or approved by the City of Los Angeles.

6

In summary, the traffic study findings are based on roadway improvements by others, 100% site access to and from Grosvenor Boulevard without a traffic signal at its intersection with Jefferson Boulevard and lacks the alternative site access analysis necessary for full disclosure.

7

Please call me if you have any questions or comments.

Sincerely,


Jerry T. Overland

Attachments

A Traffic Engineering and Transportation Planning Consulting Services Company

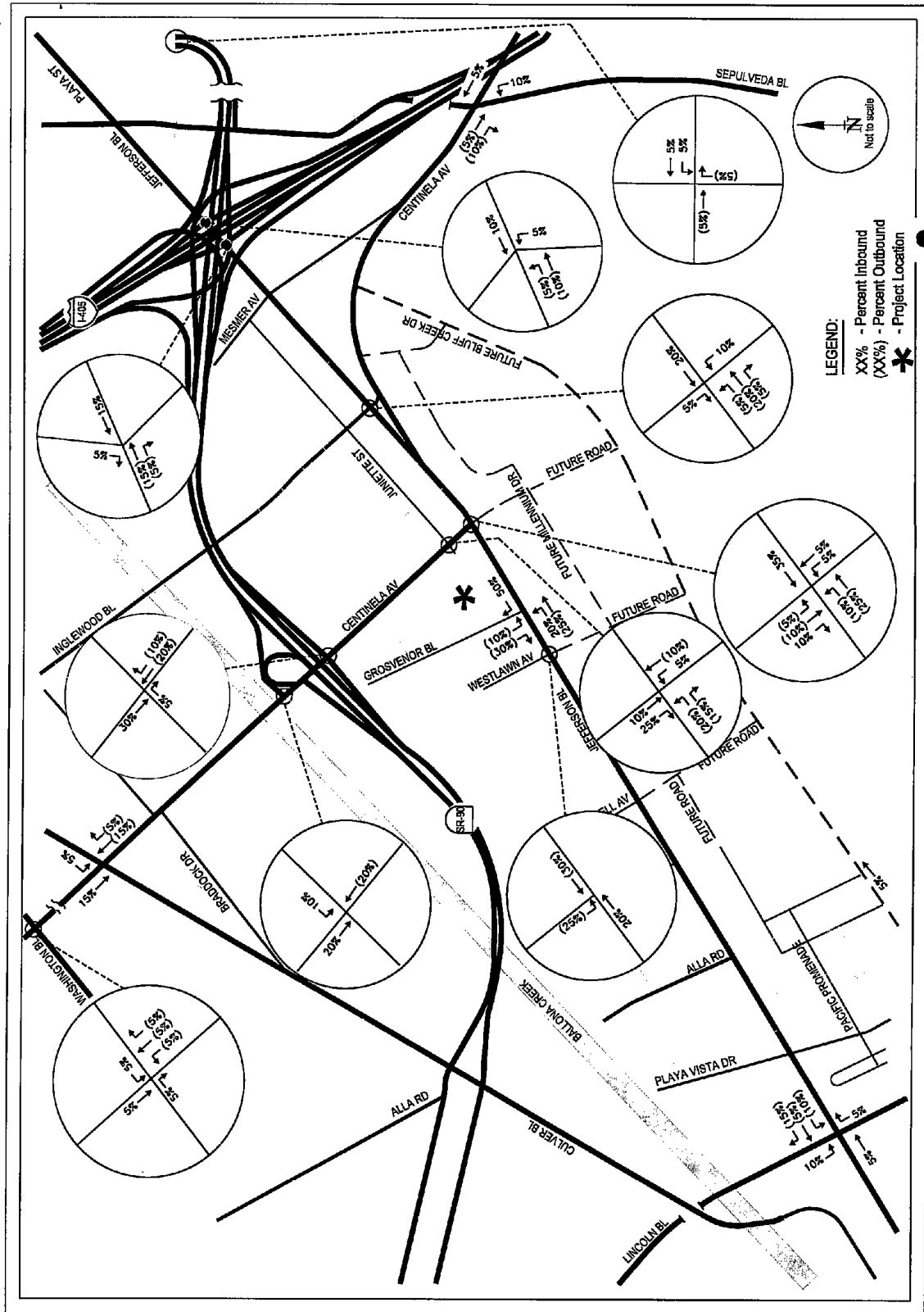


FIGURE 8
PROJECT TRIP DISTRIBUTION

Signed MOU for Archstone Project

RAJU Associates, Inc.

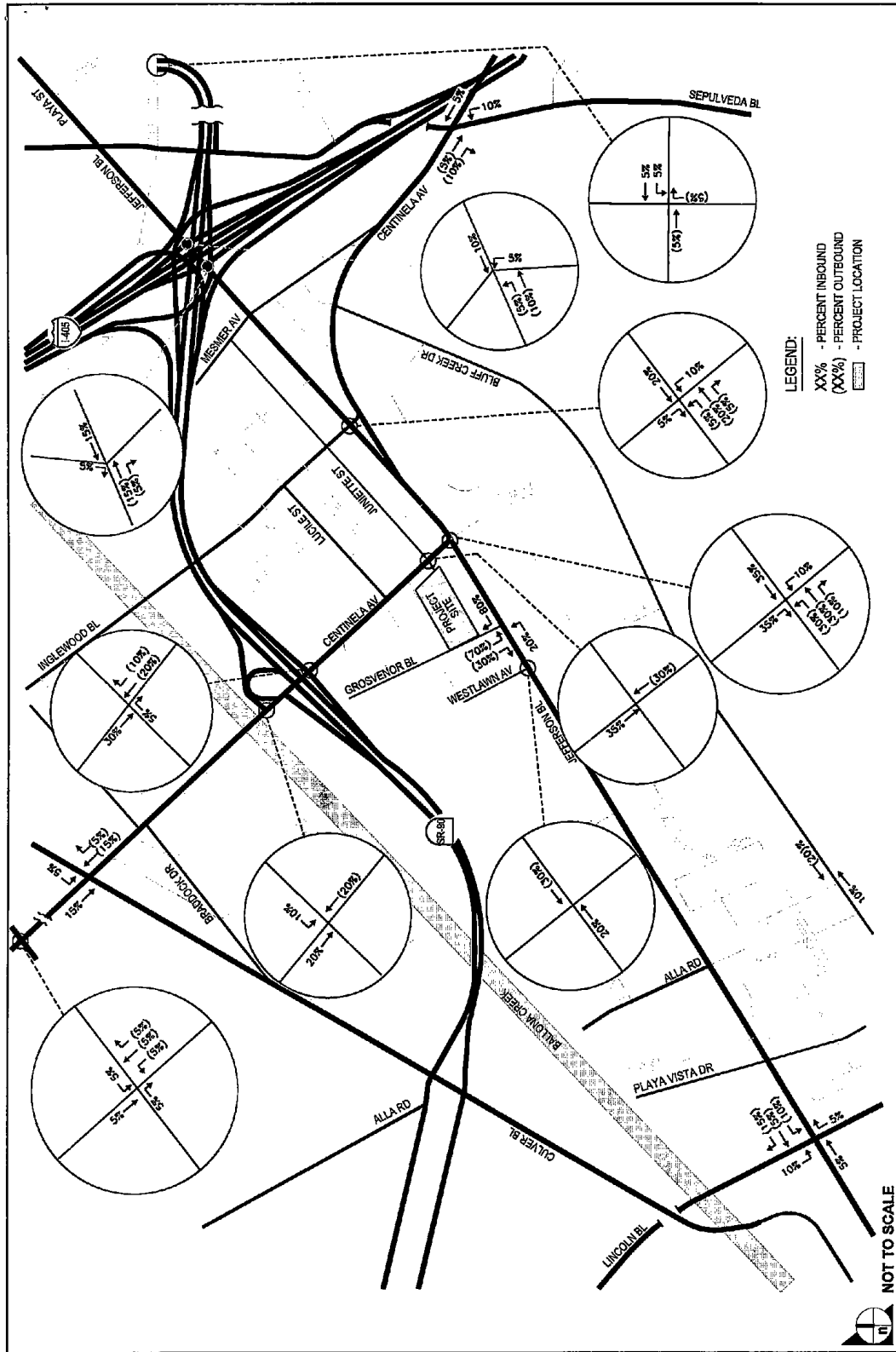
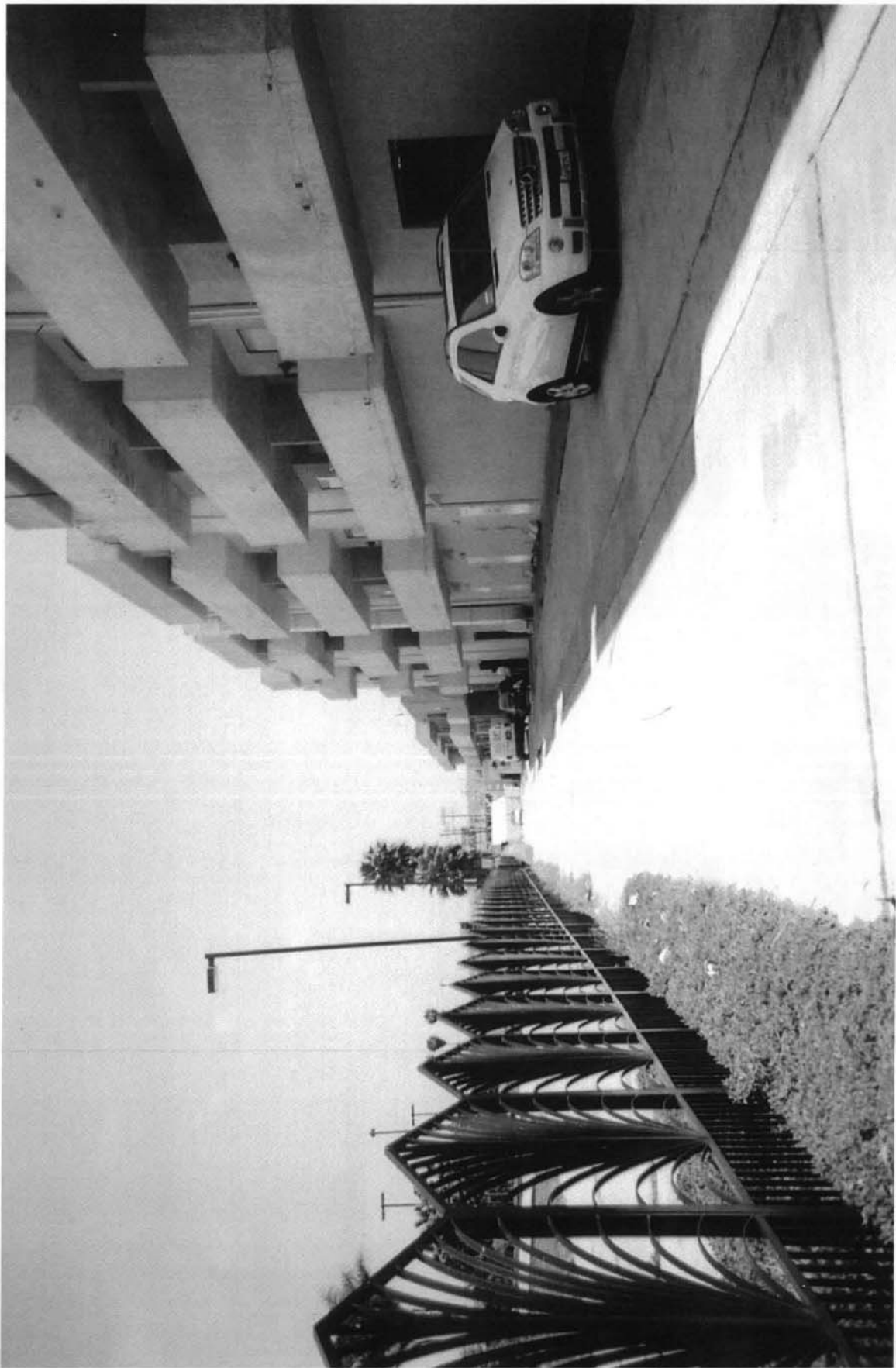


FIGURE 4.5-4

Project Trip Distribution

Proposed MOU not signed for Millennium Playa Del Mar

1052-001-12/09



Looking East



Comment Letter No. 43C

Jerry T. Overland
Overland Traffic Consultants, Inc.
27201 Tourney Road, Suite 206
Santa Clarita, California 91355
Letter dated May 17, 2010

Comment 43C.1

This comment summarizes the quality of the traffic study and suggests that the Draft EIR is incomplete and with additional information the findings in regard to traffic impact may be different than concluded in the Draft EIR.

The County has determined that the Raju Associates traffic study is complete and sufficient to analysis the traffic impacts associated with the implementation of the proposed project. This comment on inconsistencies in the Draft EIR traffic study will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 43C.2

The comment states that the traffic study follows the City of Los Angeles Department of Transportation (LADOT) guidelines and procedures, but then claims that the study is not consistent with several of the City of Los Angeles guidelines and procedures. The comment suggests that the justification for any exceptions to the guidelines and/or procedures that have been granted for the preparation of the project traffic study should be included in the report.

The Traffic Study for the Millennium –Playa Del Mar Residential Project dated December 2009, prepared by Raju Associates, Inc. follows the latest guidelines and procedures laid out by the City of Los Angeles Department of Transportation. All the impact criteria, analysis procedures, and assumptions are consistent with the City of Los Angeles guidelines. There are no exceptions or deviations from the standard procedures that are utilized in the conduct of this study.

Comment 43C.3

This comment states that the signed scoping document with the City of Los Angeles Department of Transportation (i.e., Memorandum of Understanding provided in Appendix A of the Traffic Study) contains a different project distribution than that used in the Draft EIR traffic impact analysis (attached are the two project distributions). The comment then makes three specific comments in regard to the traffic study assumptions.

The Memorandum of Understanding that the commenter is referring to was signed by LADOT in the year 2007 for a previously proposed project by a different applicant on the same site with similar size and design. Working closely with the Los Angeles County Department of Public Works, Traffic and Lighting and the City of Los Angeles Department of Transportation staff members, this memorandum was drawn up and a traffic study prepared and approved. However, a new applicant for the project decided to prepare and complete the environmental documentation required for the Project, in the year 2009 and engaged the services of Raju Associates to prepare the traffic study. This study required updated new traffic counts that were obtained and used in the updated traffic study. Raju Associates contacted both the jurisdictions and confirmed that the same MOU would be sufficient for preparation of the study.

Raju Associates prepared an updated distribution exhibit for the proposed project given the current access considerations that direct traffic to the Grosvenor Boulevard/Jefferson Boulevard intersection and the fact that a traffic signal would be provided by the Proposed Project after discussions with the LADOT and County of Los Angeles. The previous distribution patterns would not be valid given the project design and the access emphasis on Grosvenor Boulevard/Jefferson Boulevard intersection. Therefore, the traffic study correctly assumed a conservative approach to assigning all project traffic to determine the full potential of traffic impact at that location and therefore, not reduce the potential impact by distributing the same to Juniette Street and Westlawn Avenue per the old traffic analysis. In order to provide full documentation, Raju included the previously approved MOU as well as the updated distribution patterns used in the study.

The updated trip distribution figure is attached. Based on the trip distribution patterns used in the Traffic Study Report, the traffic analysis is completely consistent with the project design and correctly represents the project's traffic effects at all the intersections analyzed in the study. The project traffic assignment does not assume that Bluff Creek Drive would be completely built to Lincoln Boulevard but rather only the segment of Bluff Creek Drive between Lincoln Boulevard and Dawn Creek in the Playa Vista First Phase area was assumed to be built. Since the study, this segment of Bluff Creek Drive has already been built and is operational.

The traffic impacts have been correctly characterized in the on Table 5, page 35 of the Traffic Study for the Millennium – Playa del Mar Residential Project, dated December 2009 prepared by Raju Associates, Inc.

Comment 43C.4

This comment questions the assumptions for the future cumulative traffic analysis in context to Playa Vista. In particular, the comment claims that roadway improvements by others should not be included in the cumulative analysis and the project traffic impacts should be presented without the Playa Vista improvements to fully disclose the potential significant traffic impacts created by the project.

Most of the Playa Vista First Phase Project traffic improvements have already been built or have been designed and funded working closely with the City of Los Angeles Department of Transportation. These improvements have a high probability of being built or have been bonded/funded. The City of Los Angeles, Culver City and the County of Los Angeles Department of Public Works, Traffic and Lighting all agree with the improvement assumptions in the traffic report that these improvements would be built prior to the Playa Vista development. The potential for Playa Vista development to occur without the improvements does not exist, by the very nature of the mitigation program associated with the Playa Vista Project.

Comment 43C.5

This comment concerns the site access and whether or not access to and from Juniette Street via the southerly alley is part of the project circulation. The comment seeks clarification if access to the site is allowed from the intersection of Centinela Avenue and Juniette Street.

The design of the access system for the Proposed Project is such that the Project's traffic is directed to the intersection of Grosvenor Boulevard/Jefferson Boulevard. The project will also be providing a signal at this location. To access the Project using the un-signalized intersection of Centinela Avenue at Juniette Street would be more difficult and inconvenient than to use the adjacent signalized intersection of Grosvenor Boulevard/Jefferson Boulevard. The egress from the stop-controlled Juniette Street at Centinela Avenue would become increasingly more difficult as more of the Playa Vista residential and commercial developments get built. The provision of the traffic signal at Grosvenor Boulevard at Jefferson Boulevard would facilitate safe and efficient access/egress to the Project as well as the adjacent neighborhood traffic.

Comment 43C.6:

This comment addresses the traffic mitigation and whether the project trip distribution is applied correctly to the project traffic impacts.

The City of Los Angeles had written an assessment and approval letter for the same project description at the same site approving this mitigation measure. The Traffic Study for the Proposed Project analyzed the un-signalized intersection per the City's latest traffic study guidelines and determined that signal warrants would be satisfied under the Future with Project conditions. The Project intends to implement this mitigation measure prior to occupancy. The question of an alternative site access is not valid.

Traffic signal warrants analyses were performed under existing conditions also and it was determined that a signal warrant was satisfied. Therefore, the second concern expressed by the commenter of

whether signal warrants would be satisfied with a different distribution or whether the signal would be approved is not valid.

Comment 43C.7:

This comment concludes that the traffic study findings are based on roadway improvements by others, 100 percent site access to and from Grosvenor Boulevard and claims that the study lacks the alternative site access analysis necessary for full disclosure.

The Traffic Study is comprehensive and based on state-of-the-art current study practices accepted by the City of Los Angeles Department of Transportation, County of Los Angeles Department of Public Works Traffic and Lighting Division, the City of Culver City Transportation Department and the California Department of Transportation (Caltrans). The study evaluated worst-case conditions required by CEQA and was approved by all the reviewing agencies. All the study procedures, assumptions and methodologies and ensuing mitigations were consistent with acceptable standards of all the responsible agencies.

**Adjacent Beatrice Neighbors Responding to
Dinerstein Plan of July 6, 2010**

July 8, 2010

Los Angeles County Regional Planning Commission
c/o Ms. Mi Kim & Mr. Wayne Rew
320 W. Temple Street, Room 1340
Los Angeles, CA 90012

Dear Commissioners:

I'm writing on behalf of the 8 single family homes adjacent to the northwest side of Dinerstein's proposed Millennium Del Rey project. We've had meetings and discussions regarding this project both amongst ourselves and with Dinerstein since the Planning Commission asked Dinerstein to return to the community for further community outreach. We are very grateful to the Commission for providing this opportunity. As a result of our meetings and discussions, Dinerstein appears to have included some mitigation items into its submitted design plan. There are several items that remain a significant concern to us as we've outlined in this letter.

1. The project height should be reduced to be consistent with the surrounding land uses and could be achieved with subterranean parking.

The homeowners have made a request to Dinerstein to reduce the overall height of the project from 4 stories to 3 stories, with 2 story units in closest proximity to the adjacent single family residences. Dinerstein has made it clear that it opposes a height or density reduction. They want to minimize their construction costs. The homeowners don't want to lose their peace and privacy, and ultimately home value, in order for Dinerstein to maximize their profits.

The inclusion of subterranean parking in the Dinerstein plan actually provides a good compromise solution to these competing interests. If Dinerstein were to simply reduce the height of the parking structure by going at least partially subterranean, it would create additional housing space above the parking lot. The new floor space created by going subterranean

HOA.714837.1

could be replaced with residential units. By modifying the design, Dinerstein would still maintain the density they desire by increasing the number of units and at the same time reduce the height of the building, satisfying the homeowners and probably the larger community.

3

The parking lot, as designed, takes up a significant square footage in the overall project plan. The reduction in the parking lot height could be used to move the 4th floor housing to the 2nd and 3rd story levels over the reduced height parking area. This space could be used more efficiently to serve the overall project goals and satisfy the community's concerns.

4

An R3 zone reasonably serves as a buffer between R1 and R4 land use designations. The Club Marina apartments are a 4 story building to the south of the project site. It would be reasonable for the land use between Club Marina and the single family homes to the north of the project site to be a transition area. As designed, Millennium Del Rey towers over even the Club Marina apartments.

5

Dinerstein has expressed concern about the cost of putting parking spaces underground, however the merit of those concerns is questionable given that the neighborhood has several buildings with subterranean parking areas in very close proximity to the Millennium Del Rey project site. The 3 adjacent apartment buildings to the south of the project all have subterranean parking. I've attached photos of the parking areas and buildings for these three locations to this letter for your review. In addition, a three story commercial building has been constructed approximately ½ block northeast of the project site on Centinela. That building also has subterranean parking, with photos attached. I've also attached a map highlighting where these properties are located in relation to the project site. In reality, there are buildings with subterranean parking all over Los Angeles. Not only is it a common site in our neighborhood (including all residential condominiums and apartment buildings in the recently-constructed community of Playa Vista only 3 blocks away), it's a common site all over the County and all 88 cities in the County. It's incomprehensible that Dinerstein claims that the expense of even one level of subterranean parking is prohibitive to them. They're one of the largest builders of multi-family residential housing in the nation. If they want to place one of their buildings in our community, they should invest appropriately to conform to the area's existing and reasonable land use.

6

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2. Subterranean Parking would also eliminate the need for the proposed driveway behind our homes.

The noise impact of the driveway behind our homes has not been addressed in the draft EIR. In fact, the EIR indicates that the main access point for the project is from the alley on the opposite side of the project from our homes. Our concerns about operational noise impacts from the driveway would be moot with the removal of the driveway from behind our homes. This could be accomplished with a shift in the subterranean portion of the parking lot to the west, so that access would go directly under Dinerstein's building and into the parking structure itself, similarly to what is depicted in the attached photos of adjacent buildings.

7

The draft EIR acknowledges that the operational impacts to the residents of Millennium Del Rey exceed the County's noise standards but the impacts would be less than significant with double pane windows and air conditioning. What about operational impacts to our homes? The EIR is silent in this regard.

The primary culprit for noise impacts to our homes would be the main access road that Dinerstein proposes to install behind our homes. Many of our homes lack double pane windows and none of our homes have air conditioning. Currently, we have a quiet neighborhood at night and our windows are wide open all summer long to cool our homes. All of our homes have the bedrooms at the rear of the house.

Dinerstein now proposes to disturb our evenings by providing more than 1,200 car trips behind our homes with this project. Most of those trips will be compressed into the evening or early morning hours when people go to work and return home. This traffic will occur exactly when we're also home. When we're sleeping, Dinerstein's tenants will be coming and going to their social functions, at all hours of the day and night, just feet away from our bedroom windows, every night of the year.

8

A reasonable access point for the proposed subterranean parking lot would be directly off Grovesnor, exactly like the adjacent apartment building's Grovesnor subterranean entry. It's difficult to understand why a different project would even be considered by Dinerstein. If this project is constructed as designed, it will negatively impact the quality of our lives,

9

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our privacy and our property values. Why should we incur costs that Dinerstein declines to incur? This is where we live, not where we've decided to make an investment to turn a profit.

9

3. The two story carriage units were specifically discussed with Dinerstein and not agreed to by the homeowners.

The carriage units proposed by Dinerstein to be installed behind our property line were offered as an alternative by Dinerstein but rejected by all the homeowners. The change in submission of the plan to include two story carriage units is inconsistent with all discussions with Dinerstein. If a road is going to be forced into this project design behind our homes, we would request a single story with pitched roof garage unit.

10

However, as explained in detail in this letter, there's no need for Dinerstein to incur the costs of constructing these garage or carriage units as mitigation measures with the proposal we present in this letter. The northeast side of the project and the northwest side of the project would mirror each other and be uniform along the entire north side. There could be a fire road along the entire north side of the project with two story units behind our homes, and privacy and peace.

Thanks again to the Planning Commission for your careful consideration, time and attention to this matter. It's a very great concern to our entire neighborhood.

Sincerely,

11

Carole Suzuki

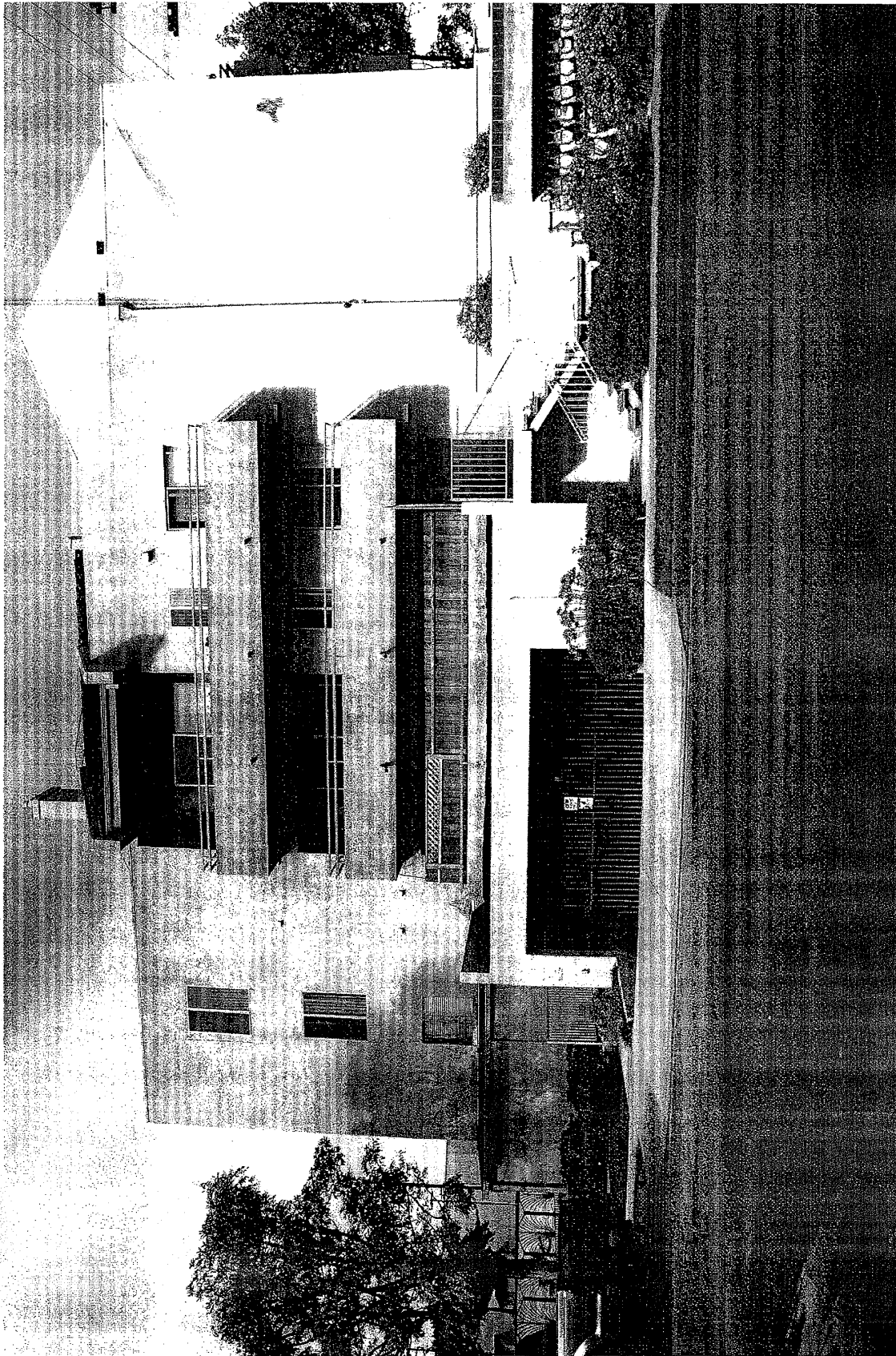
Carole Suzuki
12462 Beatrice Street
Los Angeles, CA 90066

Photos attached

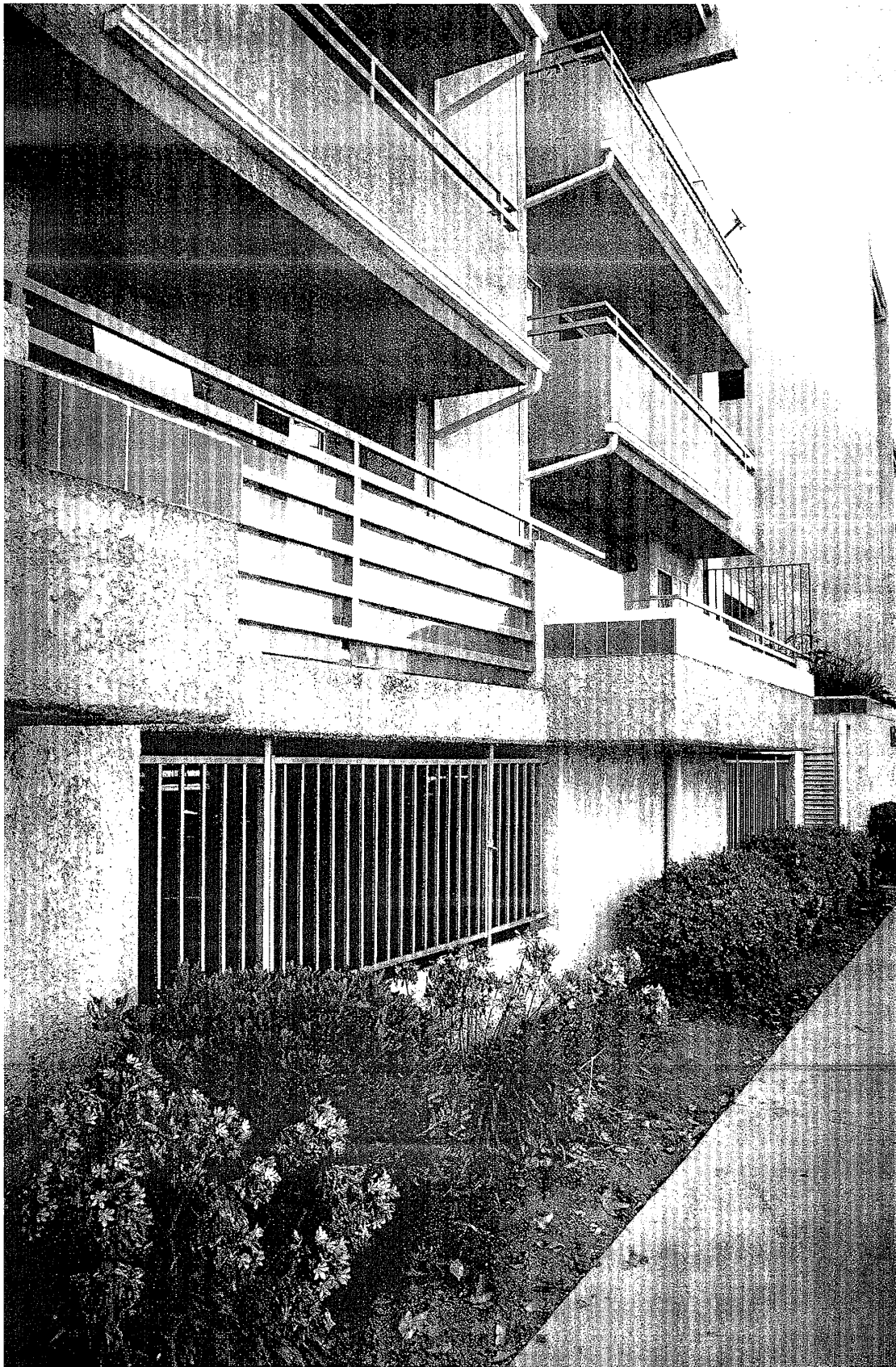
Cc: Josh Vasbinder, Dinerstein Companies
Karly Katona, Offices of Supervisor Mark Ridley-Thomas
Elizabeth Zamora, President of Del Rey Homeowners & Neighbors Assn
Wayne Avrashow, Counsel for Club Marina Apartments

HOA.714837.1

①

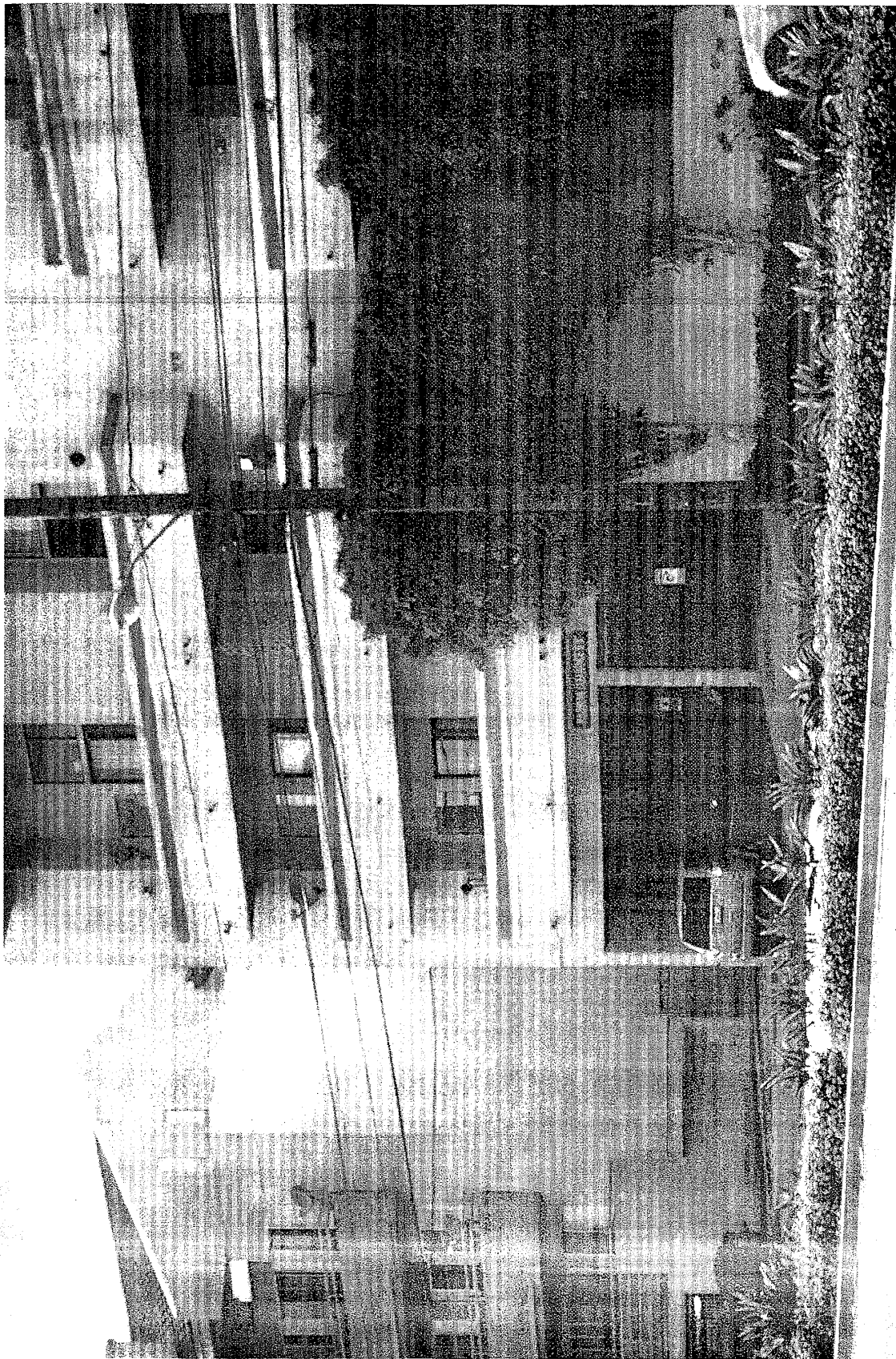


This apartment's subterranean parking entry/exit
on Grovesnor.

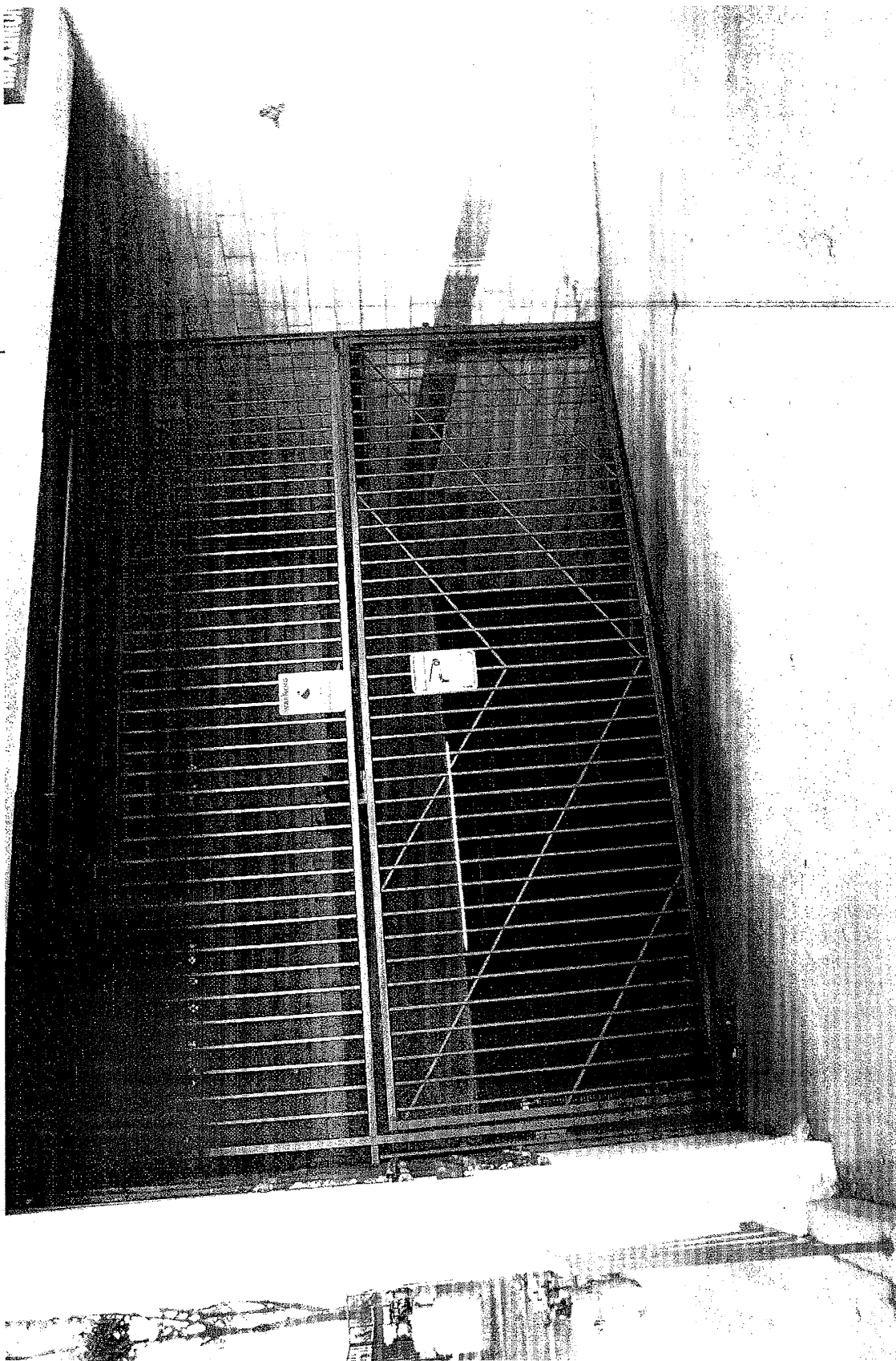


② Same building in photo ①

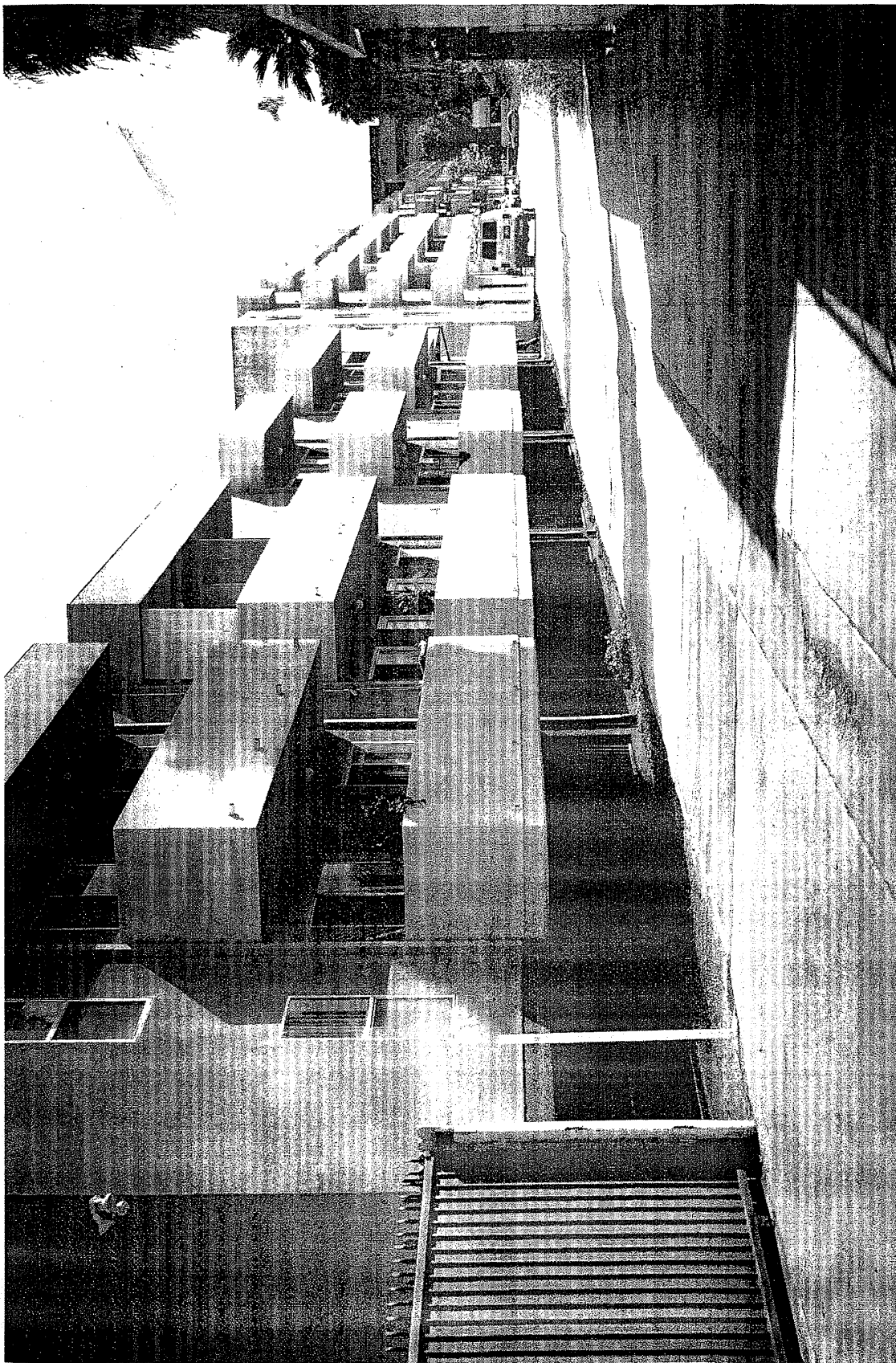
③ Club Marina Apartments

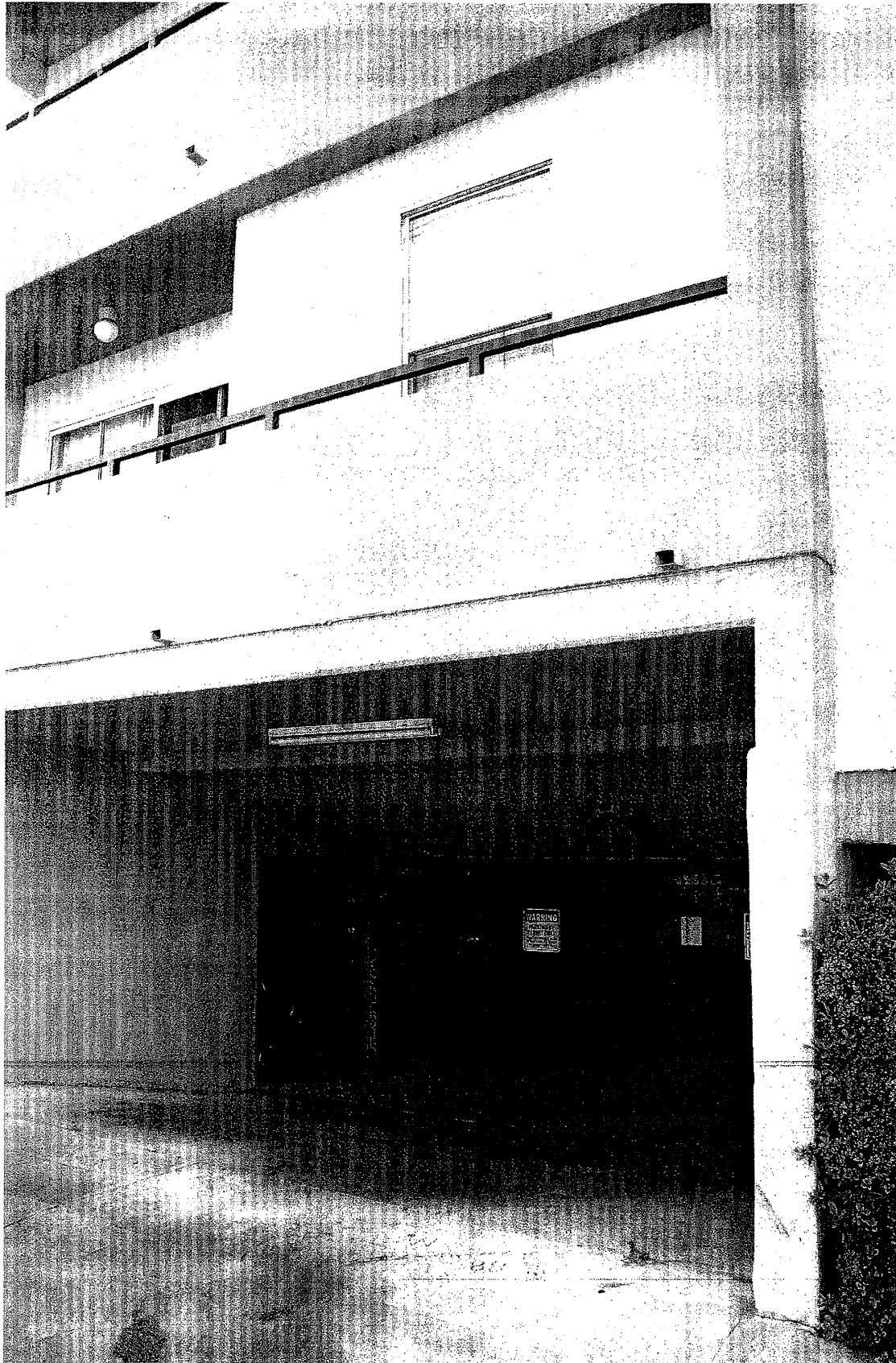


④ Club Marina Apartments Subterranean Entry



⑤ Even this 2 story apartment building is 1/2 subterranean.





⑥ same building as in photo ⑤

⑦ commercial building
at Lucille + Centinela

2 story near
lunes



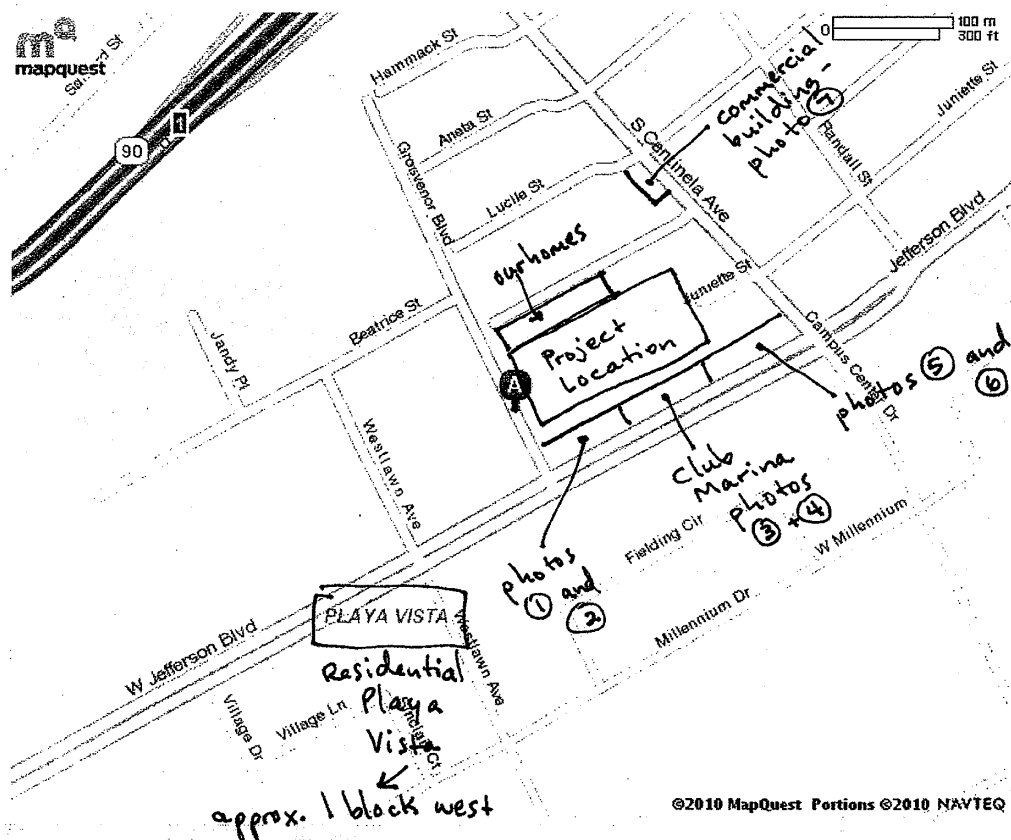
subterranean
parking



MAPQUEST.

Notes

Map of 5550 Grosvenor Blvd
Los Angeles, CA 90066-6956



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<http://www.mapquest.com/print>

7/8/2010

Comment Letter No. 44

Carole Suzuki
12462 Beatrice Street
Letter dated July 8, 2010

Comment 44.1

This comment is introductory to the specific comments that follow and will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 44.2

This comment is opposed to the building height and recommends the structure be reduced from four to three stories with two-story units closest to the adjacent single family residences on the north; please refer to **Topical Response 3: Project Design and Height**. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 44.3

This comment recommends that subterranean parking would provide a better design for the project because the overall building height could be reduced.

The Draft EIR does not identify any specific project level impacts associated with the above ground parking garage, therefore no mitigation measures or design alternatives for a subterranean parking garage would be necessary to reduce a significant impact. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 44.4

This comment is similar to **Comment 44.3** above and recommends that the residential component of the project should be designed above subterranean parking; please refer to **Topical Response 3: Project Design and Height** and response to **Comment 44.3** above. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 44.5

This comment acknowledges that the project site is transitional between the denser multi-family apartment complexes on Jefferson Boulevard and the low density single-family residences to the north of the project site.

This comment is noted and will be forwarded to the decisions makers. The transitional density of the proposed project is discussed in the Section 4.1 Land Use and Planning of the Draft EIR, which describes the proposed project as transitional between the multi-family land uses to the south and the single-family residences to the north. Please also refer to **Topical Response 1: Density and Land Use Compatibility** for further discussion.

Comment 44.6

This comment states that subterranean parking is feasible as indicated by surrounding apartment buildings that have below grade parking areas. The comment recommends the project incorporate subterranean parking. The commenter states a design preference and the comment is not directed at the adequacy or content of the Draft EIR.

Excavation for subterranean parking would further exacerbate the significant construction noise and air quality impacts. Therefore, a project design with subterranean parking would cause greater significant construction impacts.

Please refer to responses to **Comments 44.3** and **44.4** above.

Comment 44.7

This comment recommends the use of subterranean parking as a means of eliminating the northern access driveway and reducing potential operational noise impacts to the single-family residences to the north of the City of Davis. The commenter does not provide facts, reasonable assumptions based on facts, or expert opinion supported by facts in support that the use of subterranean parking would reduce operational noise impacts.

The revised project design analyzed in the Recirculated Draft EIR includes features that would further reduce operational noise for those residences.

Comment 44.8

This comment is concerned about the noise that would come from the estimated 1,200 car trips each day.

The project estimated 1,200 daily trips incorporates both incoming and outgoing vehicle trips. The majority of vehicle trips would occur during the morning peak hour of 88 trips and the afternoon peak

hour of 115 trips. The remaining daily trips would occur primarily during the morning peak and the afternoon peak. Section 4.3 Noise of the Draft EIR analyzed potential noise impacts of the project, which includes the garage, and access. Noise level monitoring was conducted by Impact Sciences, Inc., using a Larson Davis 820 Type 2 Sound Level Meter, a meter, which satisfies the American National Standards Institute (ANSI) for general environmental noise measurement instrumentation. The nearest noise sensitive receptors identified in the Draft EIR consist of single-family residences located directly north of the site, multi-family residential apartment south of the site and three single-family residences on Juniette Street next to the property's southeast corner. The Draft EIR concludes that the greatest potential increase in noise is from the increase in vehicle trips generated by the proposed project. Table 4.3-7 of the Draft EIR, Operational Noise On-Site Impacts, shows that the project would contribute traffic volumes that would increase noise levels from 0.0 dB(A) to 0.7 dB(A) along studied roadways segments. This increase is not generally perceptible to most individuals and the operational noise levels are close to the applied standard (see **Table 4.3-4**). Therefore, impacts are not considered significant given County noise assessment methodologies and current assessment standards.

The Draft EIR also concluded that noise generated by vehicles traveling on the alleyways along the northern and southern boundaries of the project site could result in a substantial permanent increase in ambient noise levels at the adjacent single- and multi-family residences, respectively.

Comment 44.9

This comment recommends a parking structure with a vehicle access point directly off Grosvenor. The commenter states a design preference but the comment is not directed at the adequacy or content of the Draft EIR. No further response is necessary.

The proposed project access is to and from Grosvenor through use of an access driveway along the northern property boundary. Noise associated with vehicular use of the access driveway would be in compliance with the County's Noise Ordinance because the parking garages and carriage units along the northwest property boundary would attenuate noise to acceptable levels. Please see the discussion of Noise Threshold 3 in Section 4.0 Sections Not Recirculated of the Recirculated Draft EIR for a more detailed discussion.

Comment 44.10

This comment expresses opposition to the placement of carriage units along the northwest property boundary adjacent to single-family residences on Beatrice Street. This opposition to the carriage units will be forwarded to the decision makers for consideration during their deliberations on the proposed project.

Comment 44.11

This comment thanks the Planning Commission for their consideration on the issues raised in this letter. This comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENNIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>[Signature]</i>	FRANCISCO LINER	11970 S. THURMAN AVE HAWTHORNE, CA 90250	
<i>[Signature]</i>	LEO GRIN	12475 W. JEFFERSON AVE LA, CA 90049	
<i>[Signature]</i>	JAN KACIN	12435 W. JEFFERSON AVE LA, CA 90049	
<i>[Signature]</i>	IGNACIO SANDOVAL	3657-W 106 ST Inglewood, CA	
<i>[Signature]</i>	MARK GERRARD	2209 Bellvue RD B90278	
<i>[Signature]</i>	SARA BURTON	12435 West Jefferson	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

Shirley Watson	LYNN MATSUZAKI	12433 Lucile St.	
Na (Co)	Mark Matsuzaki	12433 Lucile St	12433 Lucile St
Sam Fujiwara	SAM FUJISAWA	12433 Lucile St.	
Brenda	Brenda Fujiwara	12443 Lucile St	
Yutaka Mayeda	YUTAKA MAYEDA	12449 Lucile St	
Kelly Zullo	Kelly Zullo	12454 Lucile St.	
Ronald Zullo	RONALD ZULLO	12454 Lucile St	
Kim Shockey	KIM SHOCKLEY	12460 Lucile St	
Mike Shockey	MICKEY SHOCKLEY	12460 Lucile St	
Patricia Cancel	PATRICIA CANCEL	12463 Lucile St	
Timothy V. Cancel	TIMOTHY V. CANCEL	12463 Lucile St	
Mike Shockey	MIKE SHOCKLEY	12460 Lucile St.	
Brian Reed	BRIAN REED	12412 Lucile St	
James S. Haskins	JAMES HASKINS	12412 Lucile St	
Melissa Kurtz	Melissa Kurtz	12430 Lucile St	
Judy S. Mikawa	JUDY S. MIKAWA	12114 Beech St.	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
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Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147






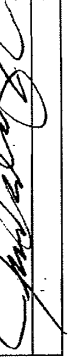
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	LISA CAHILL	10819 WESTMINSTER AV	661-221-1122
	R. Stiller	5055 Purdy Ave	661-221-1122
	GARRY KAGAN	2823 Marjorie Villa Gm	661-221-1122
	Tom Lockler	358 Hampton Dr	661-221-1122
	Mark Primack	1941 Santa Monica Blvd	661-221-1122
	Juan Flores	11476 BRADDOCK DR	661-221-1122

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147





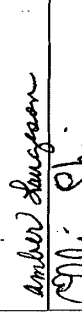
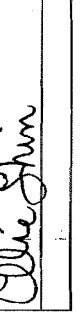
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENNIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	L. Boland	5545 W. 78 th St. LA 90045	
	Scot Boland	5545 W. 78 th St. L.A., CA 90045	
	Jessica Bandy	62435 W Jefferson LA 90066 Apt # 113	
	Chris Jordan	12435 W Jefferson LA 90066	AA 110
	AMBER LANGSTON	12435 W Jefferson LA 90066	AA 111
	ELLIE SHIN	Apt 115 12435 W Jefferson LA 90066	LA 90066

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

Carlynn Goldsmith	Carlynn Goldsmith	12464 Lucile St. LA, CA 90066	
Regina Hernandez	BETTY Goldsmith	12464 Lucile St. LA, CA 90066	CA
Shawn Nguyen	Shawn Nguyen	5355 S. Central Ave. LA 90066	
Andrew Hasnani	Andrew Hasnani	5355 S. Central Ave. LA 90066	
Edith Valencia	Edith Valencia	12414 Juniper St. Los Angeles, CA 90066	
Jason Harte	Jason Harte	5571 Central Ave. LA 90066	
Jason Harte	JASON HARTE	12470 Lucile St. LA CA 90066	
Erin Rael	Erin Rael	5465 S. Central Ave. LA CA 90066	
Dennis K. Tabara	Dennis K. Tabara	12459 Lucile St. LA 90066	
Hweihsiang Chou	Hweihsiang Chou	12459 Lucile St. LA, CA 90066	
Rosa Zamora	Rosa Zamora	12414 Beatrice Street 599	
Alejandro Ponce	Alejandro Ponce	Inglewood Blvd.	
Katie Stevens	Katie Stevens	5517 Inglewood Blvd.	
Elizabeth Zamora	Elizabeth Zamora	12415 Hammack St.	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

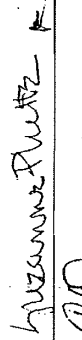
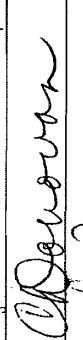
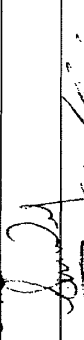
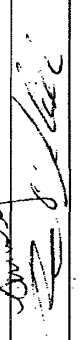


To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

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The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	Suzanne Rutz Ave	5010 MATILIA AVE SUNSHINE OAKS - CA 91423	
	CHRISTINE DONOVAN	803 N Kemp St Burbank 91505	
	Arthur Wang	12415 W. Grosvenor #120	
	YUNI IKEDA	12435 W. Grosvenor #102 Los Angeles CA 90066	
	Mary A. Wikner	12435 W. Grosvenor #1 Los Angeles, CA 90066	
	Erin Miller	12435 W. J. Peterson #311 90066	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

<i>Aisha Gumbo</i>	Aisha Gumbo	12434 Lucile St LA, CA 90066	
<i>Carol Gumbo</i>	Carol Gumbo	12434 Lucile St.	in A
<i>Sara Gumbo</i>	Sara Gumbo	12434 Lucile St	in A
<i>Adam Gumbo</i>	Adam Gumbo	12434 Lucile St.	in A
<i>Karen Jimenez</i>	KAREN TORIBO	5315 S. CENTINELA AVE	
<i>Nina Lopez</i>	Nina Lopez	5309 S Centinela Ave	
<i>Victor Alexeff</i>	VICTOR ALEXEFF	5313 S. Centinela Ave	
<i>Catherine Gonzalez</i>	Catherine Gonzalez	5331 S. Centinela Ave	
<i>Mary Starnos</i>	Mary Starnos	5331 S. Centinela Ave	
<i>Robert Gonzalez</i>	Robert Gonzalez	5331 S. Centinela Ave	
<i>JOHN F. ALESSANDRI</i>	JOHN F. ALESSANDRI	5301 S CENTINELA	
<i>Cesar Chavez</i>	Cesar Chavez	12414 Juneteer St	
<i>Irene Acuna</i>	Irene Acuna	12416 Lucile St	
<i>YASH HINDI</i>	YASH HINDI	" "	
<i>JOSEPH BROWN</i>	JOSEPH BROWN	12439 Lucile St	
<i>RAGUEL BEHREMAN</i>	RAGUEL BEHREMAN	12439 Lucile St	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
 County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
 Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
Phil Gilbey	Phil Gilbey	8119 Billowista Dr	
Parali Ramji	Parali Ramji	11030 Bannan Ave	
Rosny Ramji	Rosny Ramji	11030 Bannan Ave	
Julie Fleckenstein	Julie Fleckenstein	4527 Allalood	
Elizabeth Griffith	Elizabeth Griffith	90845 Fairbanks Way	
Carol Ortiz	Carol Ortiz	527 E. H'ing Park	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

RE: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>Edna S. Saito</i>	EDNA S. SAITO	12444 Anita St LA 90065	
<i>Kevin Stuart</i>	KEVIN STUART	12423 Anita St. 90065	
<i>Selma Duhovic</i>	SELMA DUHOVIC	3722 S. Canfield Ave 90034	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900018 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

RE: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>Henry Otonari</i>	Henry Otonari	12449 Avenida	-
<i>Craig Folsom</i>	Craig Folsom	12423 Aneta	
<i>Jill Folsom</i>	Jill Folsom	12423 Aneta	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900015 | Environmental Case NO. 200600147

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>Malcolm Walker</i>	MALCOLM WALKER	13210 Hammond St.	
<i>Nellie M. Walker</i>	Nellie M. Walker	13210 Hammond St.	
<i>Justin J. Snodgrass</i>	Justin J. Snodgrass	12423 Lucile St	
<i>Lorraine Watkins</i>	Lorraine Watkins	12429 Lucile St	
<i>David Adachi</i>	DAVID ADACHI	12416 Lucile St	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

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Sincerely,

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RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>R. K. Ashikawa</i>	ARTHUR ASHIKAWA	12430 Lucile St. L.A.	1-201-1
<i>Shigen Ashikawa</i>	Shigen Ashikawa	12430 Lucile St. L.A.	1-201-1
<i>Edward S. Stewart</i>	EDWARD S. STEWART	12442 Lucile St. L.A.	1-201-1
<i>Jan M. Stewart</i>	JAN M. STEWART	12442 Lucile St. L.A.	1-201-1
<i>Roland D. Resel</i>	ROLAND D. RESEL	12430 Lucile St. L.A. 90066	1-201-1
<i>Jan M. Stewart</i>	Jan M. Stewart	12442 Lucile St. L.A. 90066	1-201-1
<i>Erlinda Shrengor</i>	Erlinda Shrengor	12423 Lucile St	1-201-1
<i>Alan M. Matsuzaki</i>	Matsuzaki, Alan	12433 Lucile St	1-201-1
<i>Jane S. Matsuzaki</i>	Jane Matsuzaki	12433 Lucile St	1-201-1

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

To: Department of Regional Planning, Los Angeles County
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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>Casey Anderson-Hyatt</i>	CASEY ANDERSON-GROSS	12220 JUNIETTE ST. CULVERSON CA 90230	
<i>Jack Gross</i>	JACK GROSS	5556 Centinella Ave LA 90046	
<i>Debby Berg</i>	Debby Berg	12435 W. Jefferson Bl. LA	
<i>Susan Marie Boyer</i>	Susan Marie Boyer	12435 W. Jefferson CA	
<i>David Boyer</i>	David Boyer	12435 W. Jefferson LA	
<i>Alan Berg</i>	12435 W. Jefferson Bl.	Alan Berg	
<i>Kevin Berg</i>	12435 W. Jefferson Bl.	Kevin Berg	
<i>Stephanie Berg</i>	12435 W. Jefferson Bl.	Stephanie Berg	
<i>Yonoko Saguma</i>	12435 Yonoko Saguma	12075 Juniper St.	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

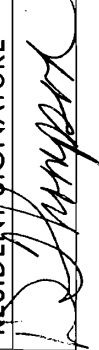
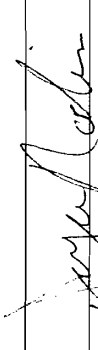

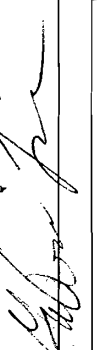


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RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	D. Thompson	6051 PANTHER BLVD	
	Joyce Korman	CULVER CITY, CALIFORNIA	
	Juan Plasencia	906 VICTORIA AVENUE	
	Peter Stachnoly	11520 HAMMAMAC ST.	
	Gabriel Lora	4336 STEVENSON AV	
	Gabriel Lora	5052 SLAUSON AVE #3	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

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Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
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RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>George Silverston</i>	ARLYS	12214 Junette	
<i>Elizabeth Silverston</i>	George Glass	12220 Junette	
<i>Tom Ball</i>	TOM BALL	12126 JUNETTE ST	
<i>Loresa Ball</i>	Loresa Ball	12126 JUNETTE ST	
<i>Elizabeth Silverston</i>	Loresa Ball	12060 Junette St.	
<i>Marie Kelly</i>	Marie Kelly	12062 Junette St	
<i>Cliff W</i>	Dave Tamamoto	12002 Junette St	
<i>Rayn Sh</i>	FAVE De	12055 Junette St.	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

SIGNATURE

PRINT NAME

ADDRESS

PHONE/EMAIL

Jovita Rodriguez	Jovita Rodriguez	12038 Juniette	
Henry Camacho	HENRY CAMACHO	12022 Juniette St.	
Michelle Alvarado	Michelle A. Rodo	12018 Juniette St.	
Maria L. Prieto	MARIELA J. PRIETO	12035 Juniette St.	
Kay Obana	K. OBANA	12055 Juniette St.	
Kenneth Obana	KEN OBANA	12055 Juniette St.	
Jacquelyn Shana	JACQUELYN SHARRER	12059 Juniette St.	
Yoneko Sugiyama	YONEKO SUGIYAMA	12065 Juniette St.	
Megumi Sugiyama	MEGUMI SUGIYAMA	12075 Juniette St.	
Jessie Gross	JESSIE GROSS	5556 Centinela Junction	
Lucinda McLaughlin	Lucinda McLaughlin	5556 Centinela LA	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
 County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
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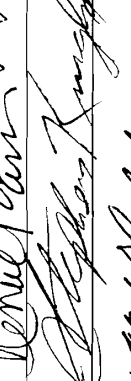

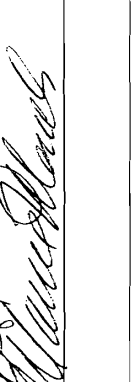
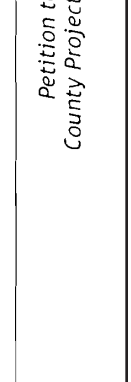

To: Department of Regional Planning, Los Angeles County
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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	Theresa Luo	12425 Beatrice St	---
	Bob Bigley	4307 Inglewood Blvd.	---
	Denise Paredes	12537 Grosvenor	---
	STEPHEN KNIGHT	12820 S. HOLT AVE	---
	MARK P. REDICK	12060 CULVER BL #3	---
	Linda Becker	11834 BEATRICE ST.	---
	Maurice Morales	11825 MARCE ST	---

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
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To: Department of Regional Planning, Los Angeles County
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Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)



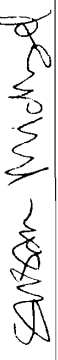
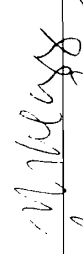
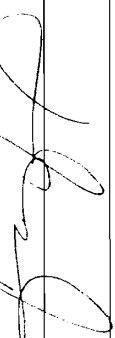



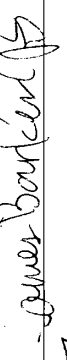
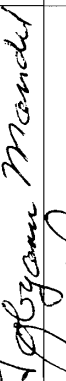

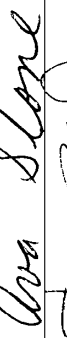

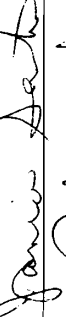
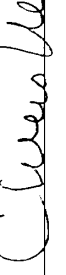
We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>[Signature]</i>	SHOICHI MOTOYI	12126 BEATRICE ST	
<i>[Signature]</i>	JANICE SHIMODA	12120 BEATRICE ST	
<i>[Signature]</i>	JOYCE SHIMODA	12120 BEATRICE ST	
<i>[Signature]</i>	HUNG NGUYEN	12070 BEATRICE ST	
<i>[Signature]</i>	XUHAN NGUYEN	12070 BEATRICE ST	
<i>[Signature]</i>	Donald Morinaka	12050 Beatrice St	
<i>[Signature]</i>	Teruko Morinaka	12050 Beatrice St.	
<i>[Signature]</i>	ELSA ISHIDA	12044 Beatrice St.	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

	KARL MATRUDDAN	12040 BEATRICE ST. CA 90230	
	MARGARET RIO	12030 BEATRICE ST	-1
	SUSAN MICHAEL	11924 W WASHINGTON	-
	MURRAY	12024 BEATRICE	-
	JONAS	12025 BEATRICE	-
	ESTEBAN GRIEGO	12055 BEATRICE ST.	1st floor
	PEARL GRIEGO	12055 BEATRICE ST	apartment
	ROSALIE SAXMAN	12051 BEATRICE ST.	apartment
	JAMES BARKER	4225 Inglewood	-
	TOBEYANN MANDEL	11906 Green St CC	-
	DONALD S. DOMBROWSKI	12531 Standard ST LA 90066	-
	AVA STONE	9400 E. CITY 90230	-
	STEVE BICKNELL	11916 WAGNER ST. Culver City CA 90230	-
	JANICE SANTOR	4332 COLLIER AVE, LA. CA. 90230	-
	CHARLES	4625 SANFORD CC, CA 90230	-

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

Kaene ST

To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the 4 Story Playa del Mar Apartments. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

We believe that the character and quality of life of Los Angeles **MUST** be preserved through intelligent planning and design that considers proper scope and scale along with the composition of surrounding neighborhoods.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
Kelly L. Zullo	Kelly L. Zullo	1111 Lucile St	
Ronald L. Zullo	RONALD L. ZULLO	1 LUCILE ST.	
Arthur Ashikawa	ARTHUR ASHIKAWA	1111 LUCILE ST.	
Shizue Ashikawa	SHIZUE ASHIKAWA	LUCILE ST.	
Sae Gamba	SAE GAMBAA	LUCILE ST.	
Acisha Gamba	Acisha Gamba	LUCILE ST.	
Adam Gamba	Adam Gamba	LUCILE ST.	
Armando Gamba	Armando Gamba	LUCILE ST.	
Carol Gamba	Carol Gamba	LUCILE ST.	
Roland Dressel	ROLAND DRESEL	LUCILE ST.	310

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd
Playa Del Mar Apartment Complex - County Project Number TR067206
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Page 1

Lucile St
18 Lucile
CENTINELA

Melissa Kurtz	Melissa Kurtz	Lucile St	
Atire Rashidi	Atire Rashidi	Lucile St	
Mark Rashidi	Mark Rashidi	Lucile St	
Erlinda Shrenger	Erlinda Shrenger	Lucile St	
Alan Ma Matsuzaki	Matsuzaki, Alan	Lucile St	
Jane Matsuzaki	Matsuzaki, Jane	Lucile St	
John F. Matsuzaki	Matsuzaki, John	Lucile St	
Mark Matsuzaki	Matsuzaki, Mark	Lucile St	
Judy Shigekawa	Shigekawa, Judy	Lucile St	
Grace Shigekawa	Shigekawa, Grace	Lucile St	
Shigekawa, Yoshimi	Shigekawa, Yoshimi	Lucile St	
Tim CANCEL	TIM CANCEL	Lucile St	
Lisa NORTON	Lisa NORTON	Lucile St	
JASON HANER	JASON HANER	Lucile St	
CAROLYN Goldsmith	CAROLYN Goldsmith	Lucile St	
Betty Goldsmith	Betty Goldsmith	Lucile St	
Ed STEWART	Ed STEWART	Lucile St	
LA STEWART	LA STEWART	Lucile St	
KAREN TOKU BO	KAREN TOKU BO	CENTINELA AVE	

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206
Page 2

18-2

1

LUCILE ST
5 CENTINELA
14 LUCILE ST

	Sal Delia	5 Centinela Ave	
	Hilda E. Delia	5 Centinela Ave	
	MARIA ALESSANDRI	5 CENTINELA	
	JOHN F. ALESSANDRI	5 CENTINELA	
	Gilda La Ferrara	24 Lucile St	
	IRENE ADACHI	LUCILE ST	
	DAVID ADACHI	LUCILE ST	
	YOSHIKO WASHITA	LUCILE ST	
	HAROLD BELTRAN	LUCILE ST	
	RAMIRO BELTRAN	LUCILE ST	
	ORLIN BELTRANDO	LUCILE ST	
	DEAN FUJIMORI	LUCILE ST	
	YUTAKA KAYEDA	LUCILE ST	
	SAM FUJIMORI	LUCILE ST	
	BRENDA FUJIMORI (Also known as Mary Lee)	LUCILE ST	
	MARY LEE	LUCILE ST	
	DENNIS KITAGAWA	LUCILE ST	
	HUI HSING CHOU	LUCILE ST	
	LUCIA DIAZ	Stinson Ave	

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206
Page 3

ANETA STREET

To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the 4 Story Playa del Mar Apartments. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

We believe that the character and quality of life of Los Angeles **MUST** be preserved through intelligent planning and design that considers proper scope and scale along with the composition of surrounding neighborhoods.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
<i>Ted R. Endow</i>	TED R. ENDOW	ANETA ST. L.A. 90066	
<i>Toru Endow</i>	TORU ENDOW	ANETA ST. L.A. 90066	
<i>Edna Saito</i>	EDNA SAITO	ANETA ST. L.A. 90066	
<i>Ethel Yasuda</i>	ETHEL YASUDA	ANETA ST. L.A. 90066	
<i>GML YASUDA-MIKATA</i>	GML YASUDA-MIKATA	ANETA ST. L.A. 90066	
<i>Henry Otomo</i>	HENRY OTOMO	ANETA ST. L.A. 90066	
<i>Roger Saito</i>	ROGER SAITO	ANETA ST. L.A. 90066	
<i>MICHAEL KAYAHARA</i>	MICHAEL KAYAHARA	ANETA ST. L.A. 90066	
<i>Alicia Saito</i>	ALICIA SAITO	ANETA ST. L.A. 90066	
<i>April Maykahan</i>	APRIL MAYKAHAN	ANETA ST. L.A. 90066	

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206
Page 1

ANETA ST

SIGNATURE	PRINT NAME	ADDRESS	TELEPHONE/FAX-MAIL
Mario Silva	Mario Silva	Aneta St	
Tony Flores	Tony Flores	Aneta St	
Michelle Flores	Michelle Flores	Aneta St	
Dolores Phipps	Dolores Phipps	Aneta St	
Robert Phipps	Robert Phipps	Aneta St	
Patrick J. Dempsey	Patrick J. Dempsey	Aneta St	
Welly Effendy	Welly Effendy	Aneta St	
Leni Kumalasari	Leni Kumalasari	Aneta St	
Gwen Learned	Gwen Learned	Aneta St	
Robert Learned	Robert Learned	Aneta St	
M.L. Sawicki	M.L. Sawicki	Aneta St	
Tom Bint	Tom Bint	Aneta St	
Evangelina Esquivel	Evangelina Esquivel	Aneta St	
Joan M. Lara	Joan M. Lara	Aneta St	
Mark Lara	Mark Lara	Aneta St	
Nico Volz	Nico Volz	Aneta St	
Diane Dempsey	Diane Dempsey	Aneta St	
Volie T. James	Volie T. James	Aneta St	
Bruce B. James	Bruce B. James	Aneta St	

[illegible]

1

Hammack Street

To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the 4 Story Playa del Mar Apartments. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

We believe that the character and quality of life of Los Angeles **MUST** be preserved through intelligent planning and design that considers proper scope and scale along with the composition of surrounding neighborhoods.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
<i>Elizabeth Zamora</i>	ELIZABETH ZAMORA	12415 Hammack St.	elizabeth.zamora@gmail.com
<i>Mary Starnes</i>	Mary Starnes	S. Centinela Ave.	
<i>Aurelia Barrera</i>	Aurelia Barrera	Hammack St.	
<i>Veronica Perez</i>	Veronica Perez	Hammack St.	
<i>Shirley Dean</i>	SHIRLEY DEAN	Hammack St.	
<i>Irene Babo</i>	Irene Babo	Hammack St.	
<i>PRISCILA SQUEJARRA</i>	PRISCILA SQUEJARRA	1 HAMMACK ST.	
<i>Raulo Claudio</i>	RAULO CLAUDIO	HAMMACK ST.	
<i>Sachito Ito</i>	SACHITO ITO	HAMMACK ST.	

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206
Page 1

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1

Beatrice St

To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the 4 Story Playa del Mar Apartments. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

We believe that the character and quality of life of Los Angeles **MUST** be preserved through intelligent planning and design that considers proper scope and scale along with the composition of surrounding neighborhoods.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
<i>Paul Suzuki</i>	Paul Suzuki	Beatrice St, LA	
<i>Richard Anderson</i>	Richard Anderson	Beatrice St	
<i>ABIGAIL CAMACHO</i>	ABIGAIL CAMACHO	Beatrice St	
<i>STEVE CAMACHO</i>	STEVE CAMACHO	BEATRICES ST	
<i>TERINADAD CAMACHO</i>	TERINADAD CAMACHO	BEATRICES	
<i>Darwin Frost</i>	Darwin Frost	Beatrice St	
<i>Martina March</i>	Martina March	Beatrice St	
<i>Isabelina J. Gottlieb</i>	Isabelina J. Gottlieb	Beatrice St	
<i>Louis A. Gottlieb</i>	Louis A. Gottlieb	Beatrice St	
<i>MAX Gottlieb</i>	MAX Gottlieb	Beatrice St	

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206
Page 1

DEMANEE

SIGNATURE	NAME	ADDRESS	PHONE
	NOAH GOTTLIEB	Beatrice St.	
	EUGENE TANABE	1-110 Beatrice St	710
	Anou Mehar	1-110 Beatrice St	
	William W. Tanabe	1-110 Beatrice St	
	Colleen Yoshimura	1-110 Beatrice St	
	Angel Alvarez	1-110 Beatrice St.	
	Eusebio Zamora	1-110 Beatrice St	
	Carlos Zamora	Beatrice St.	(310) 110
	Ruby Zamora	1-110 Beatrice St	
	Royella Zamora	1-110 Beatrice St	
	Florentina Zamora	Beatrice St.	3
	Conny Watkins Sizer	1-110 Beatrice St	310 110 0850
	Pronda Tooley	BEATRICE ST.	
	MANUEL S. VIERA	BEATRICE ST.	
	Theresa Lugo	Beatrice St	
	SARA PIZARELLA	1-110 Beatrice St	
	Cto. Masalci	1-110 Beatrice St.	
	April Ligato	Beatrice St	110

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR087206
Page 2

Elizabeth

Address

Print Name

32124913

[illegible]

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206

Comment Letter No. 45

Signed Petitions in Opposition to the Proposed Project
Petitions Not Dated

Comment 45.1

This comment represents a listing of community members and other individuals in opposition to the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Cathleen Cox
Acting Director

October 7, 2010

Anthony Curzi
Los Angeles County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Subject: Millennium - Playa Del Mar Apartments Project/Project R2009-02015
SCH#: 2006101104

Dear Anthony Curzi:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 6, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1

OCT 14 2010

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2006101104
Project Title Millennium - Playa Del Mar Apartments Project/Project R2009-02015
Lead Agency Los Angeles County

Type EIR Draft EIR
Description NOTE: Review Per Lead / Recirculated

The proposed project is a request for a Conditional Use Permit to allow 196 apartments in one primary building with a maximum height of four stories (190 feet) and three two-story buildings (22 feet) at the northwest property boundary. The proposed project includes a 329-space parking structure with a maximum height of four stories (35 feet) in addition to 20 private garages along the northwest property boundary. Additional discretionary approvals sought are a zone change from R-3-DP and R-1 to R-4-DP; and a general plan amendment to change the land use designation from Low Density Residential 1 to High Density Residential 4. The existing church, parking lot, and single-family residence will be removed. The project will require on-site grading of 54,900 cubic yards of cut of which 15,000 cubic yards of soil would be exported from the site and 16,700 cubic yards of fill to be used on-site. Egress only will be provided by an existing alley south of the project site, and ingress and egress will be provided by a new private driveway and fire lane along the northern part of the site.

Lead Agency Contact

Name Anthony Curzi
Agency Los Angeles County Department of Regional Planning
Phone 213-974-6461 **Fax**
email
Address 320 W. Temple Street
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long
Cross Streets Jefferson Boulevard and Grosvenor
Parcel No. 4211-003-068 & 4211-003-041

Township	Range	Section	Base
-----------------	--------------	----------------	-------------

Proximity to:

Highways I-405
Airports LAX
Railways No
Waterways Ballona Creek
Schools No
Land Use Existing Church/R-3-DP (Limited Multiple Residential)/Low Density Residential.

Project Issues Aesthetic/Visual; Cumulative Effects; Traffic/Circulation

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

Date Received 08/19/2010 **Start of Review** 08/19/2010 **End of Review** 10/06/2010

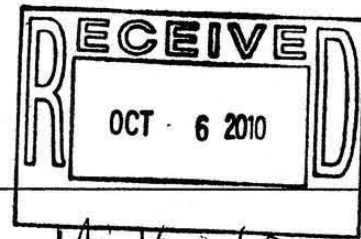
Note: Blanks in data fields result from insufficient information provided by lead agency.

Comment Letter No. 46

Scott Morgan, Acting Director
State Clearinghouse and Planning Unit
State of California Governor's Office of Planning and Research
1400 10th Street
PO Box 3044
Sacramento, California 95812
Letter dated October 7, 2010

Comment 46.1

This comment acknowledges receipt of the public Draft EIR, advises that no state agencies submitted comments on the Draft EIR, and that the Draft EIR complies with the State Clearinghouse review requirements. No further response is required.



September 15, 2010

Los Angeles County Regional Planning Commission
 Attention: Mr. Wayne Rew, Chairman
 320 W. Temple Street, "Room 1340"
 Los Angeles, CA 90012

RE: The Millennium Playa del Mar Project

Dear Chairman Rew:

This concerns Din/Cal Inc.'s proposed apartment project, Millennium Playa del Mar, located at 5550 Grosvenor (the Project.)

We are the property manager and agent for Playa Taft Associates, LLC (Playa Taft), the owner of the Playa Marina Apartment at 12427 West Jefferson Boulevard in Los Angeles, CA (Playa Marina), which is adjacent to the Project. Din/Cal Inc. has asked for the support of Playa Taft for the Project.

1

Playa Taft is pleased to confirm its support for the Project subject to the understandings in this letter. We believe it is a well designed and thoughtful project, and we applaud the efforts made by Din/Cal, Inc. in reaching out to us and others in the community to obtain feedback, much of which has been reflected in the Project. We appreciate Din/Cal Inc.'s sensitivity to community concerns, and believe the Project will be a positive addition for the neighborhood.

Din/Cal, Inc. has confirmed that the proposed Project's residential buildings along the alley, including the building proposed to be built behind Playa Marina, have been reduced to three stories as shown on the site plan dated September 15, 2010. If the Project were to become taller or larger, or the massing or design were changed in any material way from the site plan submitted to the County for the October 6th Regional Planning Commission hearing that could adversely impact Playa Marina, the support in this letter would become inapplicable.

We have expressed concerns to Din/Cal Inc. about two things with the Project, each of which Din/Cal, Inc. has agreed to mitigate as described below.

2

First, we expressed concern about the volume of traffic entering and leaving the Project from the alley that runs between the Project and Playa Marina. Din/Cal, Inc. has agreed

6222 Wilshire Blvd., Suite 400 • Los Angeles, California 90048
 (323) 556-6600 • FAX (323) 556-6620
 www.decronproperties.com

to mitigate this by changing the driveway from the Project to the alley to exit only, and by allowing only right turn movements into the alley from the driveway, as shown on the attached site plan. Din/Cal, Inc. has agreed to install "exit only" and "right turn only" signage and otherwise enforce this.

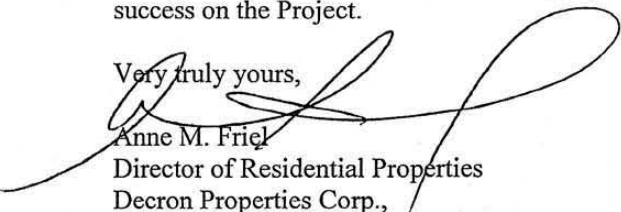
2

Second, we were concerned about the attractiveness and fullness of the Project landscaping along the alley, since some of Playa Marina's apartments have balconies that face the alley. To address this concern, Din/Cal, Inc. has agreed to have the Project landscape architect get together with our landscape architect, Bob Yamashita of the LA Group, to select reasonable trees Din/Cal, Inc. will plant along the alley across from Playa Marina, subject to those trees meeting the landscape and species requirements for the County of Los Angeles.

3

We appreciate Din/Cal, Inc. for working together with us, and we wish them much success on the Project.

Very truly yours,


Anne M. Friel
Director of Residential Properties
Decron Properties Corp.,
agent for Playa Taft Investors, LLC

Comment Letter No. 47

Anne M. Friel, Director of Residential Properties
Decron Properties
6222 Wilshire Boulevard, Suite 400
Los Angeles, California 90048
Letter dated September 15, 2010

Comment 47.1

This comment from the property manager of the neighboring Playa Marina Apartments on Jefferson Boulevard is in support of the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 47.2

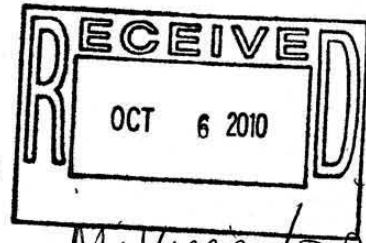
This comment indicates that the support for the proposed project comes with the understanding that access on the existing alley will be limited to egress only. The revised project design includes an egress only exit along the southern alley to reduce the potential for vehicular noise in the alley. This comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 47.3

This comment expresses concern about the attractiveness of the building along the alley. The project proponent will select reasonable trees to be planted along the alley, consistent with the drought tolerant requirements of the Green Building Program. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Tobyann Mandel, CPA
11906 Weir Street
Culver City, CA 90230-6066
Tel: 310-391-1772
Fax: 310-390-5069

e-mail:tmandelcpa@alumni.illinois.edu



October 5, 2010

Wayne Rew, Chair
Pat Modugno, Vice-Chair
Esther Valadez, Commissioner
Leslie G. Bellamy, Commissioner
Harold V. Helsley

RE: Agenda Item No. 7
Project No. R2009-02015-(2)
General Plan Amendment No. 200900013
Zone Change No. 200900013
Conditional Use Permit No. 200600147
Millennium Playa Del Mar Apartments

Sirs/Ms:

While I am on the Board of the Del Rey Homeowners & Neighbors Association, I am speaking as a private citizen who lives in Los Angeles City near the parcel of land under consideration for "upzoning."

The Del Rey city and county sections appear to be the target of much "redevelopment" without any regard for the existing population or the current strain on the infrastructure. In the City section of Del Rey we have had developers trying to "sell" the upzoning to the residents closest to the target site by telling them that it will be a "lovely upscale building with plantings," without adding how much more strain it will be on the public service, traffic, sewage system, electrical grid, and water pressure. The developers imply to these residents that this is really a courtesy call because they, the current residents, do not have much choice since more housing is needed. The neighbors who do question the project are characterized as not having power, being "kooks," and anti-progress. To demonstrate neighborhood backing for their plans, the developers will go to surrounding areas, areas which are close enough to be in the neighborhood, but not close enough to the target site to be adversely affected, and get these neighbors approval. This way the developer can show that there are "neighbors" who are for the development.

1

I understand that the city/county officials are eager for new development for jobs, prestige, and increase in tax base, but they really need to consider the existing residents and the sorry state of the current infrastructure and public services before these upzonings are done.

I am not against development, but I am against these patchwork "upzonings" in Del Rey. Until the whole Del Rey Neighborhood including impacting surrounding areas such as Culver City are thoroughly studied and a new land and use plan created, there should not be any more of these "upzonings" including this one for Millennium Play Del Mar Apartments.

Thank you for your attention.

Sincerely yours,



Tobyann Mandel

1

Comment Letter No. 48

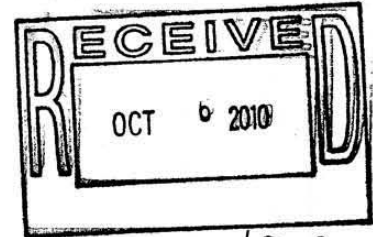
Tobyann Mandel
11906 Weir Street
Culver City, California 90230-6066
Letter dated October 5, 2010

Comment 48.1

This comment expresses concern about the amount of development in the project area including the proposed Millennium-Playa del Mar Apartments project and will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

ELIZABETH A. POLLOCK
11923 Bray Street
Culver City, CA 90230-6009
Tel.: (310) 699-5165 (cell)

October 6, 2010



Mi Kum / Rky

Wayne Rew, Chair
Pat Modugno, Vice-Chair
Esther Valadez, Commissioner
Leslie L. Bellamy, Commissioner
Harold V. Helsley, Commission

Re: Agenda Item No. 7
Millennium-Playa del Mar Apartments Project
State Clearinghouse No. 2006101014
County Project No. R2009-02015-(2)
General Plan Amendment No. 200900013
Zone Change No. 2009000013
Conditional Use Permit No. 200900150
Parking Deviation No. 2010000005
Environmental Case No. 200600147

To the Regional Planning Commission:

I have lived in Del Rey since 1991 and have served on the board of the Del Rey Homeowners' and Neighbors' Association since March 2003. I have participated in deliberations about this project since it was first proposed by a different developer (Archstone) four years ago.

1

No Upzoning

The current developer, Din/Cal, Inc., is now asking for an upzoning that is slightly less than what Archstone wanted (196 units instead of 218), but there is no reason for them to get an upzoning.

The current R-3 zoning would allow construction of 132 units and be within the county's height limit of 35 feet. (The apartment buildings on the south side are in the City of Los Angeles and are about 37 feet high, and the top floor apartments have a beautiful view of the Santa Monica Mountains.)

Archstone was going to pay \$18 million for the land and had to pull out for other reasons. Now Din/Cal, Inc. is planning to pay about \$12 million for the land and has claimed repeatedly that a

lower density “won’t pencil out.” If R-3 zoning isn’t enough, don’t buy the property! The current owner could sell to one of the backup buyers that do not need a zoning change.

1

No Solution to the Housing Crunch

The developer’s representative, Josh Vasbinder, has been quite clear that Din/Cal, Inc. does not want to build affordable housing with the restrictions that would impose. The one bedroom units will rent for about \$2000/month; the two bedroom units will rent for about \$2600/month. This project will do nothing to alleviate the shortage of affordable housing in Los Angeles. If this developer had wanted a density increase under SB 1818, the developer would have been required to prove that the project would not be economically feasible without a density bonus. Here, the county is being asked to allow increased density with absolutely no showing that it is necessary.

2

Parking

In fact, the county was asked whether the developer could provide less parking (1.8 spaces per unit) if fewer than 218 units were built. The county agreed, but that agreement was premised on the final number of units being about 160, not 196! With the high rents, it can be expected that two or more adults will live in each unit, and there is NO street parking anywhere near the proposed complex. There might be enough parking for 163 units if they keep the 329 space parking structure and keep the 24 at-grade spaces.

3

Compromise

In June, our organization voted that if the project height were kept at the county limit (35’), we would support the project design with 163 units, i.e. more than R-3 density, but not four stories tall. That design (developed by Din/Cal’s architects) would work well with the project’s goal of having a “wrap” garage so that one can park on the same level as one’s housing unit. If it’s a four story project, the people in fourth story units will have to park on the third story of the garage and take stairs or an elevator. (Din/Cal, Inc. promised that the garage height would not exceed 37 feet.)

4

Payola

Most disturbing to me is that Din/Cal, Inc. seems willing to buy its way through the planning process. I have been told that Din/Cal, Inc. will pay at least \$40,000 per household to six of the families on the north side, and an unknown amount to the apartment owners on the south side. However, the money will not be paid until mid-October, and the neighbors must stop expressing their opposition to the project. Sounds like hush money to me, particularly because the money is

5

not due until after Din/Cal, Inc. knows the outcome of today's hearing. This does not sound like the kind of company that I want exercising influence in my neighborhood.

Din/Cal, Inc. has hired signature gatherers to collect "signatures of support" at local grocery stores. When our president, Elizabeth Zamora, gathered signatures from the 114 county households in Del Rey, she did not get paid to do that. Just as she has been working for the good of the community, the Regional Planning Commission should be protecting the integrity of our community and its zoning.

Vote no on the proposed upzoning.

Very truly yours,


Elizabeth A. Pollock

Comment Letter No. 49

Elizabeth A. Pollock
11923 Bray Street
Culver City, California 90230-6009
Letter dated October 6, 2010

Comment 49.1

This comment expresses opposition to the requested zone change from R-3 for the proposed Millennium-Playa del Mar Apartments project because the project density should not exceed that allowed under the current R-3 Residential zoning of the property.

The comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 49.2

This comment questions the need for additional market-value apartments and the lack of affordable units. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 49.3

This comment questions the appropriateness to approve the less than required parking spaces for 196 dwelling units. Raju Associates, Inc. prepared a parking study for the 196-unit Millennium-Playa del Mar project design, submitted as a July 7, 2010, memorandum to the County of Los Angeles Department of Regional Planning. This parking study is included as Appendix 4.5 in the Recirculated Draft EIR. This parking study includes an evaluation of the proposed revised project peak parking demand to the parking supply proposed by the project to assess parking supply adequacy, and consequently, the parking impact of the proposed project. The study was conducted to determine the appropriate supply of parking spaces to be provided in order to adequately satisfy the projected parking demand of the revised Millennium-Playa del Mar residential project and not cause any significant parking impact on the surrounding neighborhood by limiting the likelihood that project residents or their guests would be inclined to park on local streets in the vicinity of the project site. This evaluation estimated the parking demand for the project using a calculation based on nationally published parking demand rates, and estimating based on historical data from actual observed demands in Southern California. The Recirculated Draft EIR Traffic Section concluded that the proposed project would provide 353 parking spaces on site, which is more than sufficient to meet project demand. The study further concluded that the proposed revise project design would have a surplus of 29 parking spaces on site, and there would be

no parking impact on neighboring local streets from implementation of the proposed revised Millennium-Playa del Mar Apartment project.

The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 49.4

This comment states that the Del Rey Homeowners & Neighbors Association would consider accepting a 163 unit apartment complex with a maximum height of 35 feet and three stories. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 49.5

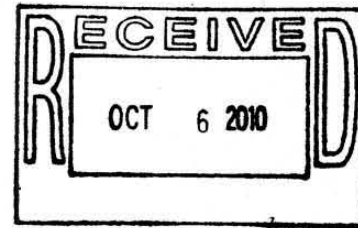
This comment expresses concern about the manner in which the project proponent has interacted with the community. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.



**DEL REY HOMEOWNERS &
NEIGHBORS ASSOCIATION**
P.O. Box 661450 • Los Angeles, CA 90066

October 6, 2010

Wayne Rew, Chair
Pat Modugno, Vice-Chair
Esther Valadez, Commissioner
Leslie G. Bellamy, Commissioner
Harold V. Helsley, Commissioner



Re: Agenda Item No. 6
Project No. R2009-02015-(2)
General Plan Amendment No. 200900013
Zone Change No. 200900013
Conditional Use Permit No. 200900150
Environmental Assessment No. 200600147
Millennium Playa Del Mar Apartments

Dear LA County Regional Planning Commission,

The board of the Del Rey Homeowners & Neighbors Association resolved to oppose the proposed Millennium Playa del Mar project. The board also resolved to support a plan with a maximum of 163 units, provided that the project height is no more than three stories. The board made this resolution as a result of the developer's representation (Josh Vasbinder) to make additional accommodations: a right turn only egress from the parking garage alley location, measures to reduce the noise and air emissions from the parking garage, a single story garage at the ingress, a two story limit along the entire northern wall, a sound wall on the north side, and most importantly an actuated signal light at the intersection of Grosvenor Boulevard and Jefferson.

The project you are considering today towers at a height of 4 stories, far surpassing the 35 feet height allowed by its current R-3 zoning. Furthermore, the proposed density of 196 units is much too dense located next to one story single family homes.

We ask you to please consider the impact of this project on the greater Del Rey community and deny the general plan amendment, deny the zone change and deny a conditional use permit for this project. Please approve only an R-3 project that is a maximum of 35 feet high.

I thank you for the opportunity to make this public comment.

Sincerely,

Elizabeth Zamora
President, Del Rey Homeowners & Neighbors Association
Vice President, Del Rey Neighborhood Council
Chair, Planning and Land Use Committee of the Neighborhood Council

Comment Letter No. 50

Elizabeth Zamora, President
Del Rey Homeowners & Neighbors Association
P.O. Box 661450
Los Angeles, California 90066
Letter dated October 6, 2010

Comment 50.1

This comment expresses the opposition of the Del Rey Homeowners & Neighbors Association to the proposed Millennium-Playa del Mar Apartments project and states they would support 163 units, building height of three stories, a right turn only egress from the parking garage, a single story a the ingress, a two story limit along the entire northern wall, a sound wall on the north side, and a signal light of Grosvenor and Jefferson.

The comment will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment does not question the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

Comment 50.2

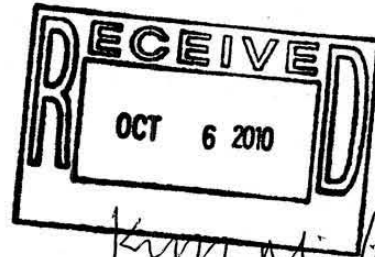
This comment expresses the opposition to the proposed revised Millennium-Playa del Mar Apartments project design of 196 units at a height of four stories because the project density exceeds that allowed under the current R-3 Residential zoning of the property and the proposed density is too dense located next to one story homes. Please see Topical Response 1. Density and Land Use Compatibility and Topical Response 3: Project Design for a detailed discussion.

The opposition to this revised design will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.



October 6, 2010

Wayne Rew, Chair
Pat Modugno, Vice-Chair
Esther Valadez, Commissioner
Leslie G. Bellamy, Commissioner
Harold V. Helsley, Commissioner



Re: Agenda Item No. 6
Project No. R2009-02015-(2)
General Plan Amendment No. 200900013
Zone Change No. 200900013
Conditional Use Permit No. 200900150
Environmental Assessment No. 200600147
Millennium Playa Del Mar Apartments

Dear Los Angeles County Regional Planning Commission,

The Del Rey Neighborhood Council (DRNC), a board of 13 elected community leaders chartered by the City of Los Angeles, endorsed the Del Rey community's request to oppose the proposed Millennium Playa del Mar Apartment project.

1

We do not support the developer's request for a zone change from R-3 to R-4. We have taken our collective position as a result of considering the developer's presentation of the project, public testimony and the hundreds of petitioners who submitted their sentiments in writing in opposition of this project. We reasonably request that you take into consideration the voice of the Del Rey community as you make your recommendation to the Los Angeles County Board of Supervisors.

We emphasize to you the deeply shared conviction of our elected council and other community groups to take the appropriate action on behalf of community.

Sincerely,

Eric De Sobe, President
Del Rey Neighborhood Council
edesobe@gmail.com

cc:
Los Angeles County Supervisor Mark Ridley-Thomas

Comment Letter No. 51

Eric De Sobe, President
Del Rey Neighborhood Council
Letter dated October 6, 2010

Comment 51.1

This comment expresses the opposition of the Del Rey Neighborhood Council to the proposed Millennium-Playa del Mar Apartments project because the project density exceeds that allowed under the current R-3 Residential zoning of the property. This opposition will be forwarded to the decision makers for consideration during their deliberations on the proposed project. The comment is not directed at the adequacy or content of the Draft EIR. Consistent with *State CEQA Guidelines* Section 15088(c), no further response is required.

APPENDIX 3.0

Attachments to Comment Letters



BILL ROSENDAHL

City of Los Angeles
Councilmember, Eleventh District

Committees

Chair, Transportation
Vice Chair, Trade, Commerce & Tourism
Member, Budget & Finance
Member, Ad Hoc on Economic Recovery &
Reinvestment
Member, Board of Referred Powers

April 27, 2010

Anthony Curzi
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

Re: Draft Environmental Impact Report, Playa Del Mar Apartments Project
5550 Grosvenor Boulevard

Dear Mr. Curzi:

I am writing to express my concerns regarding the proposed project located at 5550 Grosvenor Boulevard, in an unincorporated section of the county. Although this property is outside of the City of Los Angeles, the district I represent surrounds the project area, and the families who will be most impacted by this project reside within the City of Los Angeles.

My constituents who live near this project, in the Los Angeles community of Del Rey, have serious concerns about this project. With the proposed increases in height and density, this 216 unit apartment complex potentially threatens this neighborhood's quality of life. My constituents' concerns include, but are not limited to: increased traffic congestion on already gridlocked residential streets, and noise and air pollution from an above-grade parking structure that is out of character and scale with the adjacent community.

As a result of these concerns, I join the Del Rey Neighborhood Council and the Del Rey Homeowners and Neighbors Association in urging Los Angeles County to deny the request for a general plan amendment and to deny the request for a zone change. If you have any questions, please contact my Field Deputy, Nancy Franco, at nancy.franco@lacity.org (310) 568-8772.

Regards,

BILL ROSENDAHL
Councilmember, 11th District

Cc: Los Angeles County Supervisor Mark Ridley Thomas

BR:Nf/nf

Westchester Office
7166 W. Manchester Boulevard
Westchester, CA 90045
(310) 568-8772
(310) 410-3946 Fax

City Hall
200 N. Spring Street, Room 415
Los Angeles, CA 90012
(213) 473-7011
(213) 473-6926 Fax

West Los Angeles Office
1645 Corinth Avenue, Room 201
Los Angeles, CA 90025
(310) 575-8461
(310) 575-8305 Fax



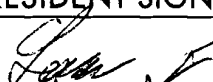


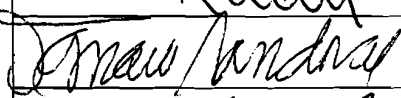
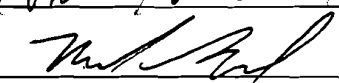
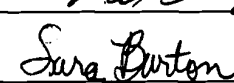
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	FRANCISCO LUNA	HAWTHORNE, CA 90050 11970 S. TOWER AVE	
	LEO GRIN	12435 W. JEFFERSON LA, CA 90066	
	JAY KACIN	12435 W. JEFFERSON LA, CA 90066	
	IGNACIO SAMDOVAL	3652 W 106 ST Inglewood, CA	
	MARK GERARD	2209 Fullerton Rd B90278	
	SARA BURTON	12435 West Jefferson	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

Lynn Matsuzaki	Lynn Matsuzaki	12433 Lucile St.	
Mark Matsuzaki	Mark Matsuzaki	12433 Lucile St	1000001 0100
Sam Futinami	SAM FUTINAMI	12443 Lucile St.	
Brenda Fujinami	Brenda Fujinami	12443 Lucile St	" "
Yutaka Mayeda	YUTAKA MAYEDA	12449 LUCILE ST	
Kelly Zullo	Kelly Zullo	12454 Lucile St.	
Ronald Zullo	RONALD ZULLO	12454 Lucile St	
Kim Shockley	KIM SHOCKLEY	12460 Lucile St	
Mickey Shockley	^(may 21) MICKEY SHOCKLEY	12460 Lucile St	
Patricia Cancel	PATRICIA CANCEL	12463 LUCILE ST	
Timothy V. Cancel	TIMOTHY V. CANCEL	12463 LUCILE ST	
Mike Shockley	MIKE SHOCKLEY	12460 LUCILE ST.	
Brian Reed	BRIAN REED	12412 Lucile St	
James S. Haskins	JAMES HASKINS	12412 Lucile St	
Melissa Kurtz	Melissa Kurtz	12430 Lucile St	
Judy S. Mikawa	JUDY S. MIKAWA	12114 Beatrice St.	

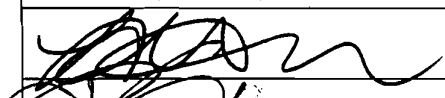


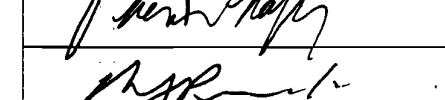
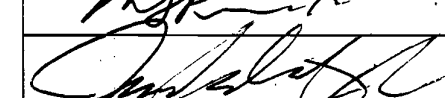
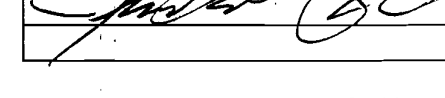
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd, We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	LISA CAHILL	10819 WESTMINSTER AV 90034	
	J. STILLER	5055 BURBANK BLVD	
	GARRY KRAW	2823 MARYKAY VILLAGE	
	TOM LOCKYER	358 HAMPTON DR	
	Mark Primack	1941 Santa Monica Blvd	
	JUAN FLORES	11426 BRADDOCK DR	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

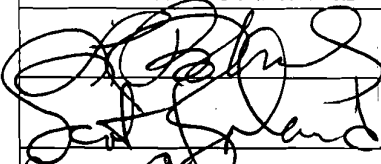
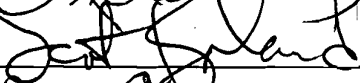

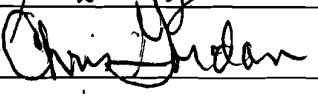
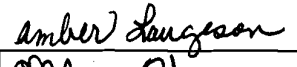
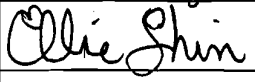
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	L. Boland	5545 W. 78 th St. LA 90045	
	Scot Boland	5545 W. 78 th St. L.A., CA 90045	
	Jessica Cong	12435 W Jefferson LA 90066 Apt # 113	
	CHRIS GORDAN	12435 W Jefferson LA 90066 Apt #110	
	AMBER LAUGESON	12435 W Jefferson LA 90066 Apt #114	
	ELLIE SHIN	Apt 115 12435 W Jefferson LA 90066	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

<i>Carolyn Goldsmith</i>	CAROLYN Goldsmith	12464 Lucile St. L.A., CA. 90066	
<i>Betty Goldsmith</i>	BETTY Goldsmith	12464 Lucile St. LA, CA. 90066	CA
<i>Shawn Virginia</i>	Shawn Virginia	5355 S. Centinela. LA 90066	
<i>Andrew Hosner</i>	Andrew Hosner	5355 S. Centinela LA 90066	
<i>Edith Valencia</i>	Edith Valencia	12414 Juniper St. Los Angeles, CA 90066	
<i>Jason Hanel</i>	JASON HANEL	12470 LUCILE ST. LA CA 90066	
<i>Glen Raad</i>	Glen Raad	5465 S. Centinela Ave LA CA 90066	
<i>Dennis Kitagawa</i>	DEANIS KITAGAWA	12459 Lucile St LA 90066	
<i>Huei Hsiang Chou</i>	Huei Hsiang Chou	12459 Lucile St LA, CA 90066	
<i>Rosa Zamora</i>	ROSA ZAMORA	12414 Beatrice Street	
<i>Alejandro Ponce</i>	Alejandro Ponce	5519 Inglewood Blvd.	
<i>Katie Stevens</i>	Katie Stevens	5517 Inglewood Blvd.	
<i>Elizabeth Zamora</i>	Elizabeth Zamora	12415 Hammack St,	


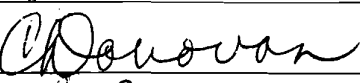
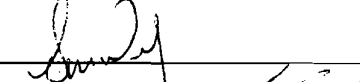
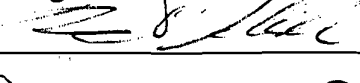

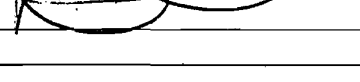
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	5010 MATILYA AVE	5010 MATILYA AVE Sherman Oaks - CA 91423	
	CHRISTINE DONOVAN	803 N Kemp St Burbank 91505	
	Arthur Wang	12435 W. Jefferson #120	
	YUNI IKEDA	12435 W. Jefferson #102 Los Angeles CA 90066	
	Mary A. Wickser	12435 W. Jefferson Bl #101 Los Angeles, CA 90066	
	ERIN MILLER	12435 W. Jefferson #311 90066	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147

Aeisha Gumbo	Aeisha Gumbo	12434 Lucile St LA, CA 90066	
Carol Gumbo	Carol Gumbo	12434 Lucile St. ²⁰⁰⁶⁶	
Sae Gumbo	SAC Gumbo	12434 Lucile St	
Adam Gumbo	Adam Gumbo	12434 Lucile St.	
Karen Tokubo	KAREN TOKUBO	5415 S. CENTINELA AVE	
Nina Lopez	Nina Lopez	5309 S Centinela Ave	
Victor Alezeff	VICTOR ALEZEFF	5313 S. Centinela Ave	
Catherine Gonzalez	Catherine Gonzalez	5331 S. Centinela Ave	
Mary Starnos	Mary Starnos	5331 S. Centinela Ave	
Robert Gonzalez	Robert Gonzalez	5331 S. Centinela Ave	
JOHN F. ALESSANDRI	JOHN F. ALESSANDRI	5501 S CENTINELA	
Cesar Chavez	Cesar Chavez	12414 Juniette St	
Irene Adachi	Irene Adachi	12416 Lucile St	
YASHIRO TADA SHITA	YASHIRO TADA SHITA	" "	
BERNARD	BERNARD	12439 Lucile St	
RAGUEL BEHTRAN	RAGUEL BEHTRAN	12439 Lucile St	

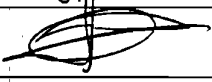
To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

Re: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
Phil Gilboy	Phil Gilboy	3119 Billawista Dr	
Pyarali Ramji	Pyarali Ramji	11030 Barman Ave	
Roshy Ramji	Roshy Ramji	11030 Barman Ave	
Julie Fleckenstein	Julie Fleckenstein	4527 Alta Road	
S. Elizabeth Griffin	Elizabeth Guff	70845 Fairbanks Way	
	Carlos Ortiz	527 E. NYC Park	

Jacqueline C. Hagar	Jacqueline C. Hagar	5313 Centinela LA. ^{L.A. 90066}	
Eusebio Zamora	EUSEBIO ZAMORA	12414 Beatrice St.	
Richard Zamora	RICHARD ZAMORA	12414 Beatrice St.	
Carlos Zamora	CARLOS ZAMORA	12414 Beatrice St.	
Ruby Zamora	Ruby ZAMORA	12414 Beatrice St.	

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>Edna S. Saito</i>	EDNA S. SAITO	12444 Aneta St LA 90066	
<i>Kevin Short</i>	KEVIN SHORT	12423 Aneta St. 90066	
<i>Selma Duhovic</i>	SELMA DUHOVIC	3722 S. Canfield Ave 90034	

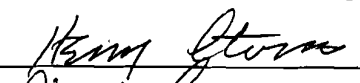
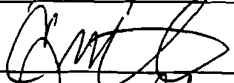
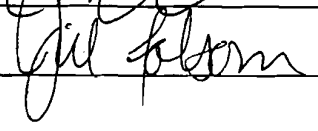
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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	HENRY OTONIO	12449 Aneta	-
	Craig Folsom	12423 Aneta	
	Jill Folsom	12423 Aneta	

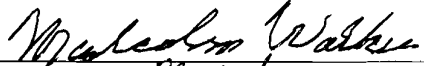
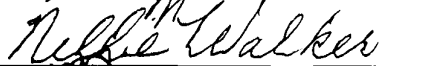

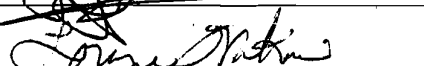
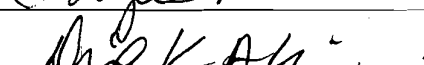
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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
	MALCOLM WALKER	12210 Hammack St.	
	Nellie M. Walker	12210 Hammack St.	
	Justin J. Sina	12423 Lucile St	
	Lorraine Wakino	12429 Lucile St	
	DAVID ADACHI	12416 Lucile St	

To: Department of Regional Planning, Los Angeles County
Los Angeles County Regional Planning Commission

RE: DEIR for the Millennium-Playa Del Mar Apartments Project (Project No. R2009-02015)

We, the citizens of Los Angeles, strongly OPPOSE changing the current zoning of the property located at 5550 Grosvenor Blvd. We OPPOSE the proposed project MILLENIUM PLAYA DEL MAR APARTMENTS. We OPPOSE the request for a plan amendment from Low Density Residential 1 to High Density Residential 4, a zone change from R-3-DP and R-1 to R-4-DP, and a conditional use permit to develop a 216 unit, maximum four story apartment building on approximately five acres in the unincorporated area. We believe this development will negatively impact the quality of life of the immediate community because of its out of scale height and density.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT NAME	ADDRESS	TELEPHONE/EMAIL
<i>Arthur Ashikawa</i>	ARTHUR ASHIKAWA	12450 Lucile St. L.A.	
<i>Shizue Ashikawa</i>	Shizue Ashikawa	12450 Lucile St. L.A.	
<i>Edward G. Stewart</i>	EDWARD G. STEWART	12442 Lucile St La	
<i>Ila M. Stewart</i>	ILA M. STEWART	12442 Lucile St La	
<i>Roland Drebel</i>	ROLAND DREBEL	12430 LUCILE ST. LA 90046	
<i>Gita A. Feeran</i>	GITA A. FEERAN	12424 Lucile St L.A., CA. 90066	
<i>Erlinda Shrenger</i>	Erlinda Shrenger	12423 Lucile St	
<i>Alan M. Matsuzaki</i>	Matsuzaki Alan	12433 Lucile St	
<i>Jane S. Matsuzaki</i>	Jane Matsuzaki	12433 Lucile St	

Petition to Oppose zoning variances and increased residential density at 5550 Grosvenor Blvd.
County Project NO. R2009-02015 | General Plan Amendment NO. 200900013 | Zone Change NO. 200900013
Conditional Use Permit NO. 200900150 | Environmental Case NO. 200600147



Del Rey Homeowners and Neighbors Association
P.O. Box 661450 Los Angeles, CA 90066
www.delreyhome.org

January 14, 2010

VIA EMAIL AND U.S.P.S.

Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012
Attn: Anthony Curzi

Re: Notice of Preparation
Playa del Mar Apartment Project
County Project Number R2009-02015
Case Nos.: RENV200600147, RCUPT200900150
RZCT200900013, RPAT2009000013

Dear Mr. Curzi:

The proposed Din/Cal Millennium-Playa Del Mar apartment project is located in the heart of the Del Rey community. Over the course of the last forty-five days the Del Rey Homeowners And Neighbors Association's Board Of Directors has reviewed the Notice of Preparation ("NOP"), attended three presentations by Din/Cal and have gone door-to-door discussing the project with the community. The Board has now voted to oppose any increase in density or up-zoning whatsoever as we cannot find the benefit to the community and surrounding neighborhoods. Furthermore, the Board has also voted to submit the following comments, which we request to be addressed in the final EIR.

Project Size. Our primary concern is with the proposed size and density of this project. Del Rey is primarily a low density, residential community, and we believe it is important to our community to retain that neighborhood character. There is no reason for the County of Los Angeles to approve an up-zoning change from six units per acre to forty-four units per acre for this 4.93 acre parcel of land, a huge increase from what is allowed by the County's General Plan.

Ingress/Egress. An alley is defined as "a narrow service street for serving rear of lots, less than 30 feet in width." (Los Angeles County Department of Public

Works Mapping and Property Management Division, Street Nalley Policy as of 6/28/99). A 216 unit apartment complex cannot be adequately serviced with just an alley on the south and a fire alley on the north. Even with the required three-foot dedication on the southern alley we do not believe these alleys would provide sufficient access for the residents coupled with public services especially if emergency services personnel need to access the property.

The Initial Study portion of the NOP (p. 16) anticipates that the proposed project will generate approximately 111 a.m. and 138 p.m. peak hour trips, i.e. 111+ vehicles leaving the parking structure and entering Grosvenor Blvd. during a single hour, i.e. one car entering every 23 seconds. It is not realistic to expect that the vehicles can get from the alley onto Grosvenor Blvd. quickly enough to keep the traffic flowing, particularly if Din/Cal installs the proposed traffic light at the Grosvenor Blvd. & Jefferson Blvd. intersection.

The ingress/egress onto Centinela Avenue is even more problematic. The nearby intersection of Centinela Ave. & Jefferson Blvd. already is considered to have congestion that cannot be mitigated. Northbound Grosvenor Blvd. is a cul de sac, and there are no traffic controls to protect people entering Centinela Ave. from the residential streets that connect Grosvenor Blvd. with Centinela Avenue.

These streets and alleyways immediately surrounding the proposed development were not designed to meet the demand of a project of this large scale and density and will only burden already congested streets resulting in diminished quality of life.

Parking. There is already insufficient parking on the surrounding streets due to underparked industrial and commercial uses on Grosvenor and the prior parking on Centinela that is now restricted to only a few hours a day as part of Playa Vista's traffic mitigation measures in 2005.

In short, our knowledge suggests the NOP has concluded incorrectly that the project will not result in any hazardous traffic conditions and will not result in parking problems with a subsequent impact on parking conditions (NOP, p.16).

Geology. We have serious reservations about the geotechnical aspects of the project. With the water table just 10 feet below the surface and the methane gas problems that have surfaced at Playa Vista, what impact will the weight of these structures have on the geology of the subsurface?

Parkland. When Din/Cal spoke to our Board in December, they said they were planning to build 216 residential rental units, a clubhouse, business center, fitness center, pool, spa and landscaped courtyards. The project is expected to generate \$370,000 of Quimby Funds.

Del Rey has a dearth of parkland. The 5550 Grosvenor property is centrally located and the last big piece of relatively open land in Del Rey. Ideally, we

would like to see the entire parcel dedicated for use as a park. If Din/Cal chooses to move forward with this project, as allowed within the existing zoning, the recreational facilities should be made available to the general public.

View Impacts. If the zoning change were granted, the apartments would be 60 feet high, the parking structure 56 feet high. (NOP p. 7). However, if the R-1 & R-3 zoning were retained, the maximum height would be 35 feet from the existing or excavated grade (Los Angeles County Zoning Ordinance). The NOP states (p.15), "Building height may create winter shadows on properties to the north" and "Parking structure may cause light and glare problems on properties to the south." These problems will be avoided if the County would simply say "NO" to the proposed zoning change.

Potential Errors Within The NOP. Upon researching the current lots owned by the City Of Angels Church, the proposed development plans and the County's Notice Of Preparation dated December 10, 2009, we am very perplexed by what lots are included and their zoning. According to the NOP the project consists of only two lots (4211-003-068 & 4211-003-041), which the NOP states are zoned R-3DP and R-1. Upon researching the lots with the County's parcel maps and GIS system it appears that the project is actually five lots all zoned LCR1YY & LCR1*, see below. It would appear that this is a major error that must be corrected and the public must be notified in order to not feel that it is being misled.

ADDRESS	A.P.N.	LOT SIZE	BLDG SIZE	ZONING
5550 Grosvenor	4211-003-068	171626	38987	LCR1YY
5550 Grosvenor	4211-003-038	17651	0	LCR1*
5550 Grosvenor	4211-003-040	1202	0	LCR1YY
5544 Grosvenor	4211-003-041	5863	1490	LCR1YY
12414 Juniette	4211-003-042	240	0	LCR1*
Total SF		196582	40477	
Total Acres		4.51		

The Del Rey Homeowners and Neighbors Association is very concerned about the proposed magnitude of this project and its potential impact on the Del Rey community. When the draft environmental impact report is being prepared, we strongly urge that each of the issues above be meticulously examined.

Very truly yours,
DEL REY HOMEOWNERS & NEIGHBORS ASSOCIATION


George Gross, First Vice President
310/586 0344

Del Rey Neighborhood Council Planning Committee

Memorandum

To: Anthony Curzi
From: Jonathon Neumann, Chair of Planning
Date: March 21, 2008
Re: NOP for 5550 Grosvenor Blvd.

Dear Mr. Curzi,

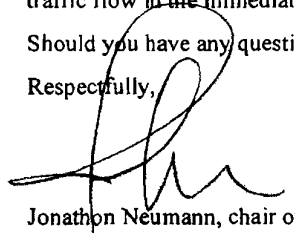
Recently the proposed project located at 5550 Grosvenor Boulevard was heard before the Del Rey Neighborhood Council ("DRNC") for its consideration. Present at the meeting were numerous community members that spoke out against the size and scope of the project.

The DRNC voted to oppose the increase in zoning of the property located at 5550 Grosvenor Boulevard from thirty (30) units per acre to the proposed fifty (50) units per acre.

Of utmost concern of the council is the burden that the increased density will put on the surrounding streets. Parking and traffic flow in the immediate area are of concern already and the increased density of this project will compound the problem.

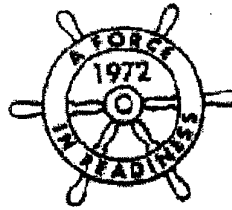
Should you have any questions, please feel free to contact me via email at jonathon.neumann@delreync.org.

Respectfully,



Jonathon Neumann, chair of planning for Del Rey Neighborhood Council

CC: Mike Stafford and Mark Redick, Del Rey Neighborhood Council via email
Whitney Blumenfeld, Councilman Rosendahl's office via email
Various Community Members



Del Rey Homeowners and Neighbors Association
P.O. Box 661450
Los Angeles, CA 90066
www.delreyhome.org

March 14, 2008

VIA EMAIL AND U.S.P.S.
Impact Analysis Section
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012
Attn: Anthony Curzi

Re: Notice of Preparation
Playa del Mar Apartment Project
County Project Number TR067206
Case Nos.: RENV200600147, RCUP20060016
RZCT200600008, RPAT200600007
State Clearinghouse Number 2006 101104

Dear Mr. Curzi:

The proposed Archstone Playa del Mar project is in the heart of Del Rey. We have reviewed the Notice of Preparation ("NOP") and have voted to send you the following comments:

Project Size. Our primary concern is with the proposed size of this project. Del Rey is primarily a low density, residential community, and we believe it is important to our community to retain that neighborhood character. There is no reason for the County of Los Angeles to approve a zoning change from six units per acre to 44 units per acre for this 4.93 acre parcel of land.

Ingress/Egress. An alley is defined as "a narrow service street for serving rear of lots, less than 30 feet in width." (Los Angeles County Department of Public Works Mapping and Property Management Division, Street Name Policy as of 6/28/99) This 218 unit apartment complex cannot be adequately serviced with just an alley on the south and a fire alley on the north. Reportedly, Archstone told

the Department of Public Works last year that it is unwilling to dedicate land so that the alleys can be widened. If there were a major fire in the apartments (remember the MGM Grand?), we do not believe these alleys would provide sufficient access for the emergency services personnel.

The NOP (p. 16) anticipates that the proposed project will generate approximately 155 peak hour trips, i.e. 155 vehicles leaving the parking structure and entering Grosvenor Blvd. during a single hour, i.e. one car entering every 23 seconds. It is not realistic to expect that the vehicles can get from the alley onto Grosvenor Blvd. quickly enough to keep the traffic flowing, particularly if Archstone installs the promised traffic light at the Grosvenor Blvd./Jefferson Blvd. intersection.

The ingress/egress onto Centinela Avenue is even more problematic. The nearby intersection of Centinela Ave./Jefferson Blvd. already is considered to have congestion that cannot be mitigated. Northbound Grosvenor Blvd. is a cul de sac, and there are no traffic controls to protect people entering Centinela Ave. from the residential streets that connect Grosvenor Blvd. with Centinela Avenue.

Parking. Presently, the property serves as a parking lot for about 500 cars driven by employees of local businesses – Chiat Day, Rhythm & Hues, Investor's Business Daily. Where are those people going to park if this property is developed? There is already insufficient parking on the surrounding streets.

In short, our knowledge of the area suggests to us that the NOP has concluded incorrectly that the project will not result in any hazardous traffic conditions and will not result in parking problems with a subsequent impact on traffic conditions. (NOP, p.16)

Geology. We have serious reservations about the geotechnical aspects of the project. With the water table just 10 feet below the surface and the methane gas problems that have surfaced at Playa Vista, what impact will the weight of these structures have on the geology of the subsurface?

Parkland. When Archstone representatives spoke to our board on April 9, 2007, they said they were planning to build 218 residential rental units, a clubhouse, business center, fitness center, pool, spa and landscaped courtyards. The project is expected to generate \$370,000 of Quimby funds.

Del Rey has a dearth of parkland. The 5550 Grosvenor property is centrally located and the last big piece of relatively open land in Del Rey. Ideally, we would like to see the entire parcel dedicated for use as a park, but if the county is going to allow Archstone to build this project, the recreational facilities should be

Impact Analysis Section
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012
Attn: Anthony Curzi
March 14, 2008
Page 2

made available to the general public, and the roof of the parking structure should be used for a greenscape of some kind.

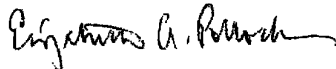
Economics. In their meetings with our board on April 9 and October 1, and with members of the community on September 27, 2007, Archstone said that 10 per cent of the units will be "workforce housing," but reportedly, they have told the County that only five percent of the units will be "workforce housing." The rent for a workforce housing unit should be about \$1500 per month, calculated using 120% of an annual income of \$62,000 as "workforce" income. However, we also were told that half of the units will be one bedroom and are expected to rent for \$2000 per month. The two bedroom units will rent for about \$2600 per month. Given that the developer has applied for a tract map so that the units can be sold as condominiums or rented as apartments, we have our doubts that this project will do anything to increase the availability of affordable housing in Del Rey.

View Impacts. If the zoning change were granted, the apartments would be 60 feet high, the parking structure 56 feet high. (NOP p. 7). However, if the R-3 zoning were retained, the maximum height would be 35 feet from the existing or excavated grade. (Los Angeles County Zoning Ordinance) The NOP states (p.15), "Building height may create winter shadows on properties to the north. Parking structure may cause light and glare problems on properties to the south." These problems could be avoided if the county would simply say "no" to the proposed zoning change.

The Del Rey Homeowners and Neighbors Association is very concerned about the proposed magnitude of this project and its potential impact on the Del Rey community. When the draft environmental impact report is being prepared, we strongly urge that each of the issues above be meticulously examined.

Very truly yours,

DEL REY HOMEOWNERS & NEIGHBORS ASSOCIATION



Elizabeth A. Pollock
Recording Secretary



Chris Nevil
President

LUCILE ST

To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the **4 Story Playa del Mar Apartments**. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

We believe that the character and quality of life of Los Angeles **MUST** be preserved through intelligent planning and design that considers proper scope and scale along with the composition of surrounding neighborhoods.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
Kelly L. Zullo	Kelly L. Zullo	Lucile St	
Ronald L. Zullo	RONALD L. ZULLO	LUCILE ST.	
Arthur Ashikawa	ARTHUR ASHIKAWA	LUCILE ST.	
Shizue Ashikawa	SHIZUE ASHIKAWA	LUCILE ST.	
Sac Gamboa	SAC GAMBOA	Lucile St	
Aisha Gamboa	Aisha Gamboa	Lucile St	
Adam Gamboa	Adam Gamboa	Lucile St	
Armando Gamboa	Armando Gamboa	Lucile St	
Carol Gamboa	Carol Gamboa	Lucile St	
Roland Dreisel	ROLAND DREISEL	LUCILE ST.	319

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206

LUCILE ST
18 LUCILE
1 CENTINELA

Melissa Kurtz	Melissa Kurtz	Lucile St	
Adelbert	Atire Rashidi	Lucile St	
M. Rashidi	Mark Rashidi	Lucile St	
Erlinda Shrenger	Erlinda Shrenger	Lucile St	
Alan M. Matsuzaki	Matsuzaki, Alan	Lucile St.	
Jane Matsuzaki	Matsuzaki, Jane	Lucile St.	
John F. Matsuzaki	Matsuzaki, John	Lucile St.	
Mark X Matsuzaki	Matsuzaki, Mark	Lucile St.	
Judy Shige	Shigekawa, Judy	Lucile St.	
Grace Shige	Shigekawa, Grace	Lucile St.	3
Toshimi Shige	Shigekawa, Toshimi	Lucile St.	
Tim CANCEL	TIM CANCEL	1240 LUCILE	
Lisa Montague	Lisa Montague	Lucile St.	
Jason Hanel	JASON HANEL	LUCILE ST.	
Carolyn Goldsmith	CAROLYN Goldsmith	Lucile St	
Betty Goldsmith	Betty Goldsmith	Lucile St	
Ed Stewart	ED STEWART	LUCILE ST	
Ila Stewart	ILA STEWART	Lucile ST	
Karen Tokubo	KAREN TOKUBO	S. CENTINELA AVE	

LUCILE ST
5 CENTINELA
14 LUCILE ST

Sal Delia	Sal Delia	S. Centinela Ave	✓
Hilda F. Delia	Hilda F. Delia	S. Centinela Ave	✓
Maria Alessandri	MARIA ALESSANDRI	5 CENTINELA	✓
John F. Alessandri	JOHN F. ALESSANDRI	5 CENTINELA AVE	✓
Irene Adach	Gloria Adach	24 Lucile St	
Irene Adach	IRENE ADACH	LUCILE ST	
David Adach	DAVID ADACH	LUCILE ST	
Yoshiko Washita	YOSHIO WASHITA	LUCILE ST	
Marcus Beltran	MARCUS BELTRAN	Lucile St	
Marcus Beltran	MARCUS BELTRAN	Lucile St	
Oliver Devarado	OLIVER DEVARADO	Lucile St	
Dean Fujinami	DEAN FUJINAMI	Lucile St	
Yutaka Mayeda	YUTAKA MAYEDA	LUCILE ST LA	
Sam Fujinami	SAM FUJINAMI	LUCILE ST	
Brenda Fujinami	Brenda Fujinami	" " "	
Mary L. Shockley	MARY L. SHOCKLEY	LUCILE ST	
Dennis Kitagawa	DENNIS KITAGAWA	Lucile ST	
Hue Hsiang Chou	HUE HSIANG CHOU	Lucile ST	
Lucia Diaz	LUCIA DIAZ	Stinson Ave	

H-0

ANETA STREET










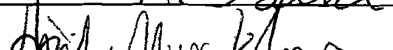
To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the **4 Story** Playa del Mar Apartments. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

We believe that the character and quality of life of Los Angeles **MUST** be preserved through intelligent planning and design that considers proper scope and scale along with the composition of surrounding neighborhoods.

Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
	TED R. ENDOW	ANETA ST. L.A. 90066	
	TORU ENDOW	ANETA ST. L.A. 90066	
	EDNA SAITO	ANETA ST. L.A. 90066	
	ETHEL YASUDA	ANETA ST. L.A. 90066	
	GAIL YASUDA-MAXIMA	ANETA ST. L.A. 90066	
	HENRY OTONARI	ANETA ST. L.A. 90066	
	ROBERT ISHIDA	ANETA ST. L.A. 90066	
	MIKI KAYAHARA	ANETA ST. L.A. 90066	
	ALICE SAKAI	ANETA ST. L.A. 90066	
	APRIL-MAY KAHN	ANETA ST. L.A. 90066	

Petition to OPPOSE zoning variances and increased residential density at 5550 Grosvenor Blvd.
Playa Del Mar Apartment Complex - County Project Number TR067206

4414 ET 14 ST

SIGNATURE	PRINT NAME	ADDRESS	TELEPHONE / E-MAIL
Mario Silva	Mario Silva	Aneta St	
Tony Flores	Tony Flores	Aneta St	
Michelle Flores	Michelle Flores	Aneta St	
Dolores Phillip	Dolores Phillip	Aneta St	
Robert Phillip	Robert Phillip	Aneta St	
Patrick J Dempsey	Patrick J Dempsey	Aneta St	
Welly Effendy	Welly Effendy	Aneta St	
Leni Kumalasari	Leni Kumalasari	Aneta St	
Gwen Learned	Gwen Learned	Aneta St. 90066	
Robert Learned	Robert Learned	Aneta St. 90066	
M.L. Sawicki	M.L. Sawicki	Aneta St. 90066	
Tom Birt	Tom Birt	Aneta St. 90066	
Evangelina Esquivel	Evangelina Esquivel	Aneta St. 90066	
Joan M Lara	Joan M Lara	Aneta St. 90066	
Mark Lara	Mark Lara	Aneta St. 90066	
Nico Volz	Nico Volz	Aneta St. 90066	
Diane Dempsey	Diane Dempsey	Aneta St. 90066	
Yolie T James-Mera	Yolie T James-Mera	Aneta St. 90066	
Bruce B. James-Mera	Bruce B. James-Mera	Aneta St. 90066	

Aneta str.

[illegible]

Hammack Street

To: Department of Regional Planning, Los Angeles County

We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the **4 Story Playa del Mar Apartments**. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

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Sincerely,

The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
<i>Elizabeth Zamora</i>	ELIZABETH ZAMORA	12415 Hammack St.	elizabeth.zamora@gmail.com
<i>Mary Starnes</i>	MARY STARNES	5. Centinela Ave.	
<i>Aurelia Barrera</i>	Aurelia Barrera	Hammack St.	
<i>Veronica Perez</i>	Veronica Perez	Hammack St.	
<i>Shirley Bean</i>	SHIRLEY BEAN	Hammack	
<i>Irene Babo</i>	Irene Babo	Hammack St.	
<i>PRISCILA S. QUEJARRA</i>	PRISCILA S. QUEJARRA	7 HAMMACK ST.	
<i>Romulo C. Quejara</i>	ROMULO C. QUEJARRA	HAMMACK ST.	
<i>Sachiko Ito</i>	SACHIKO ITO	Hammack St.	

Hammack Street

[illegible]

Beatrice St



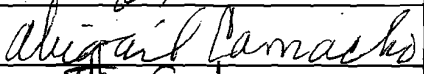


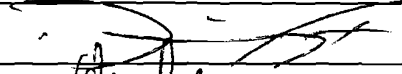
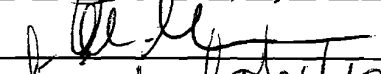
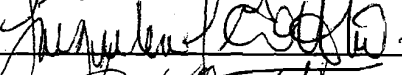


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We, the undersigned citizens of Los Angeles, strongly **OPPOSE** changing the current zoning to allow high-density residential type buildings over the limit currently allowed to be built at 5550 Grosvenor Boulevard. We **OPPOSE** the current plans in development for the **4 Story Playa del Mar Apartments**. We further **OPPOSE** a request for a tract map to combine two parcels into one; a zone change from R-3-DP to R-4-DP; a general plan amendment to change the land use designation from Low Density 1 to High Density Residential; and a Conditional Use Permit to allow 218 apartments in one building with a maximum height of four stories (60 feet) along with a 448-space parking structure with maximum height of five and one half stories (56 feet).

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Sincerely,

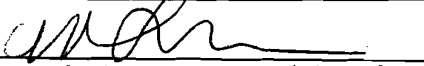
The Undersigned Citizens of Los Angeles County

RESIDENT SIGNATURE	RESIDENT'S NAME	ADDRESS	TELEPHONE OR EMAIL
	Paul Suzuki	Beatrice St, LA	
	Richard Andersen	Beatrice St	
	ABIGAIL CAMACHO	Beatrice St	
	STEVE CAMACHO	BEATRICES ST	
	TRINIDAD CAMACHO	BEATRICES	
	Darwin Fogt	Beatrice St	
	Martin March	Beatrice St.	
	Jacqueline J. Gottlieb	Beatrice St.	
	Louis A. Gottlieb	Beatrice St.	
	MAX Gottlieb	Beatrice St.	

SIGNATURE	NAME	ADDRESS	PHONE
NOAH GOTTLIEB	NOAH GOTTLIEB	Beatrice St	
EUGENE TANABE	EUGENE TANABE	1-110 Beatrice St	310
ANNA MELGAR	ANNA MELGAR	Beatrice St	
WILLIAM WILLIAMS	WILLIAM WILLIAMS	Beatrice St	
COLLEEN YOSHIMURA	COLLEEN YOSHIMURA	Beatrice St	
ANGEL ALVAREZ	ANGEL ALVAREZ	1-111 Beatrice St.	
ELISEBIO ZAMORA	ELISEBIO ZAMORA	Beatrice St	
CARLOS ZAMORA	CARLOS ZAMORA	Beatrice St.	(310) 110
ROBY ZAMORA	ROBY ZAMORA	Beatrice St	
ROGELIO ZAMORA	ROGELIO ZAMORA	Beatrice St	
FLORENTINA PONCE	FLORENTINA PONCE	Beatrice St.	310
CORY WATKINS SIZCH	CORY WATKINS SIZCH	2 Beatrice St	6850 6850
MANOA TOOLEY	MANOA TOOLEY	BEATRICE ST.	
MANUEL S. VIEIRA	MANUEL S. VIEIRA	BEATRICE ST.	
THERESA LUD	THERESA LUD	Beatrice St	
SARA PIZATELLA	SARA PIZATELLA	6 Beatrice	
CTO MASALCI	CTO MASALCI	1 Beatrice St.	
APRIL LIGATO	APRIL LIGATO	Beatrice St	

DEATRICE ST.

SIGNATURE PRINT NAME ADDRESS TELEPHONE

	Matilda Simon	Beatrice ST L.A. 90066	4-
Sharon Kuda	SHARON KUDA	Beatrice St LA 90066	-

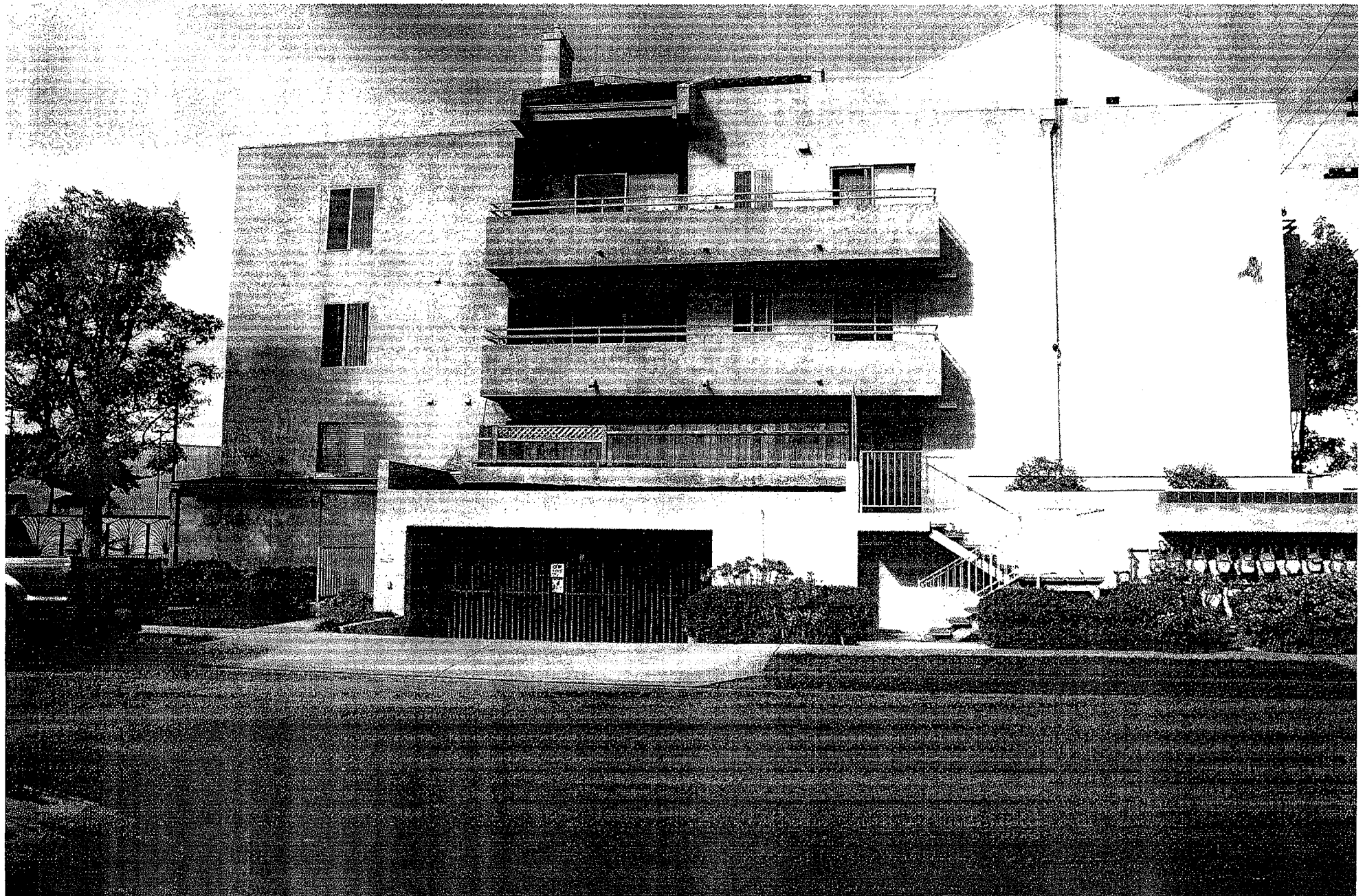


Looking East



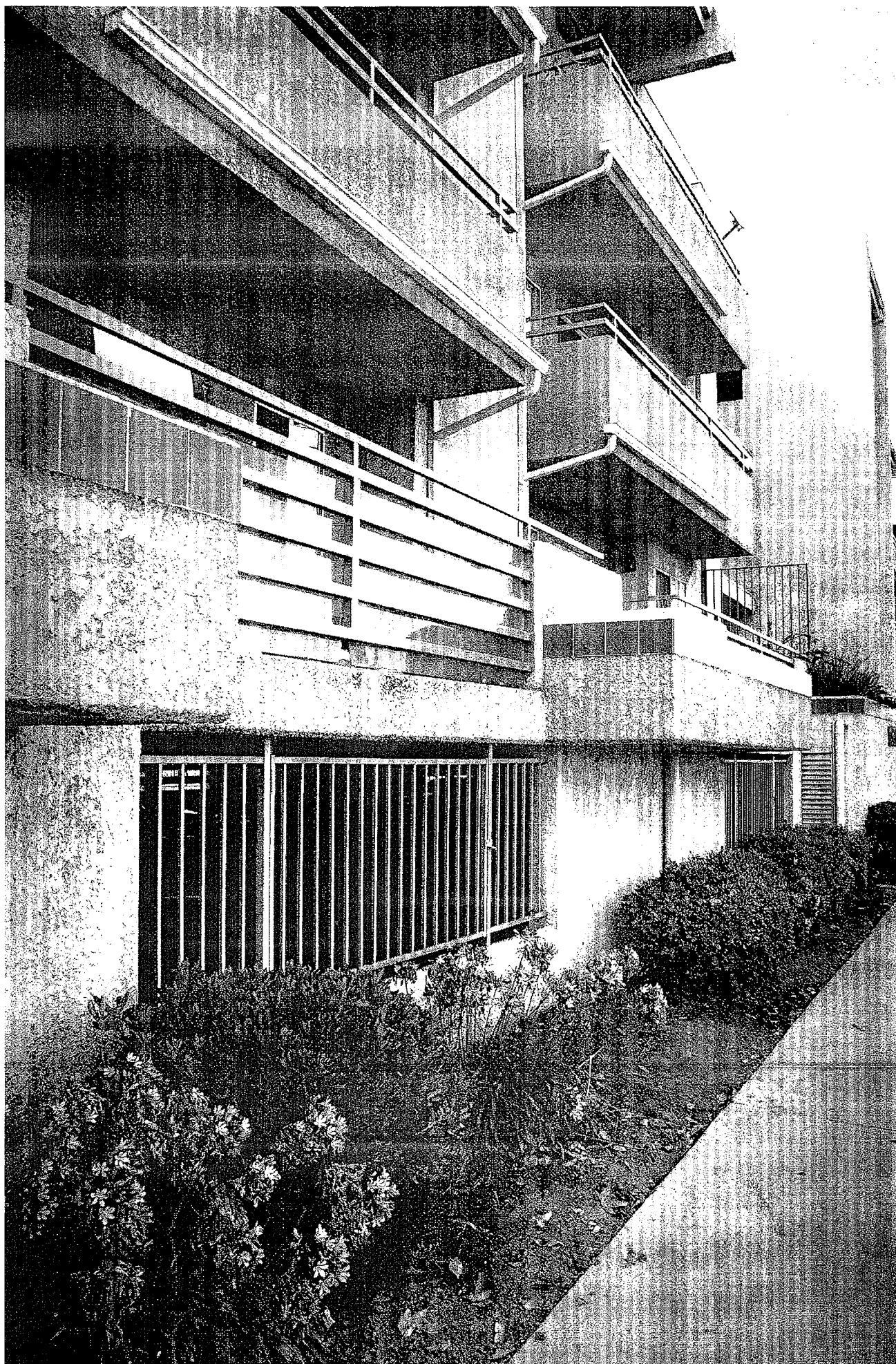
looking West alley

①



This apartment's subterranean parking entry/exit
on Grovesnor.

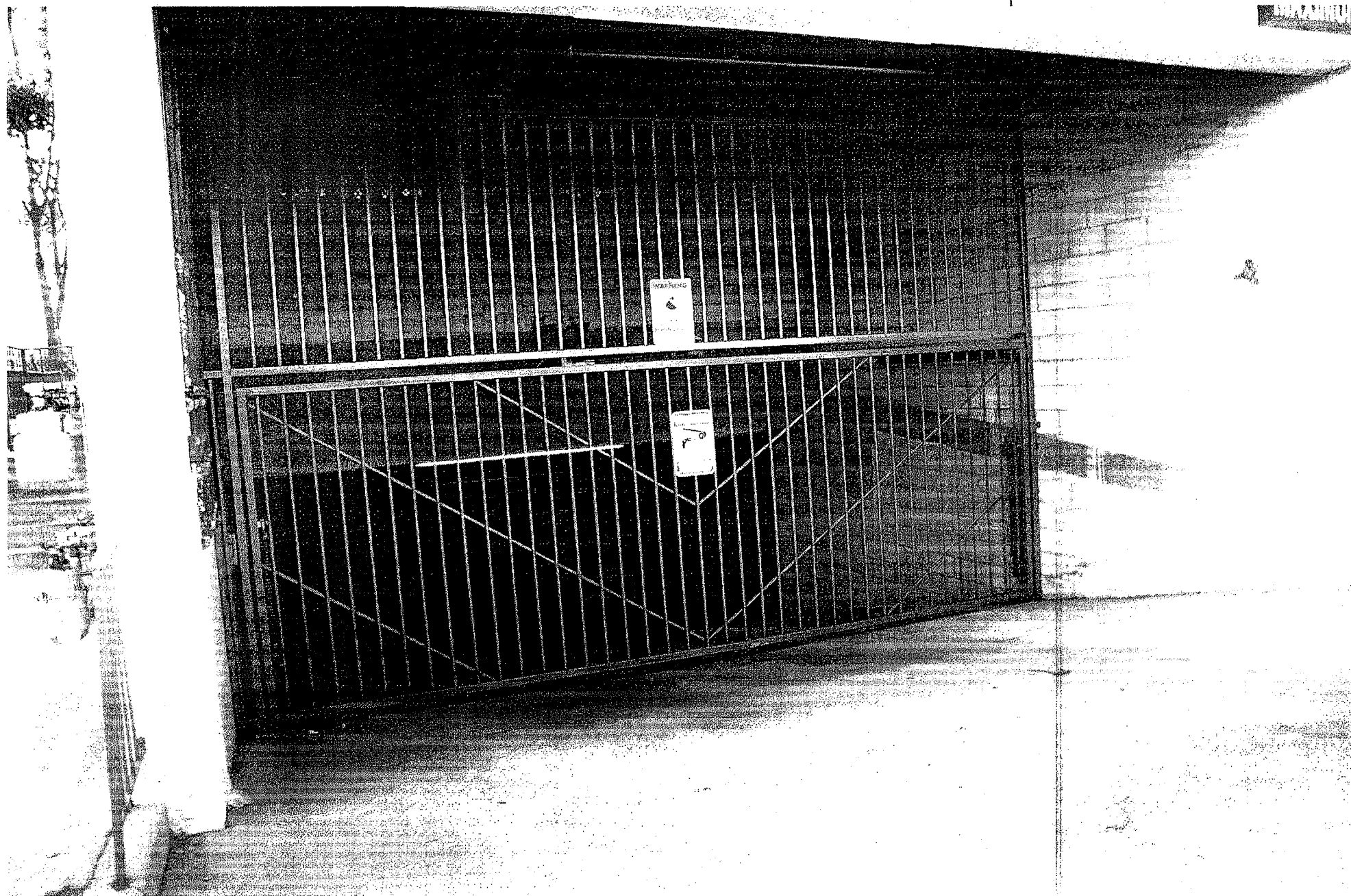
② Same building in photo ①



③ Club Marina Apartments

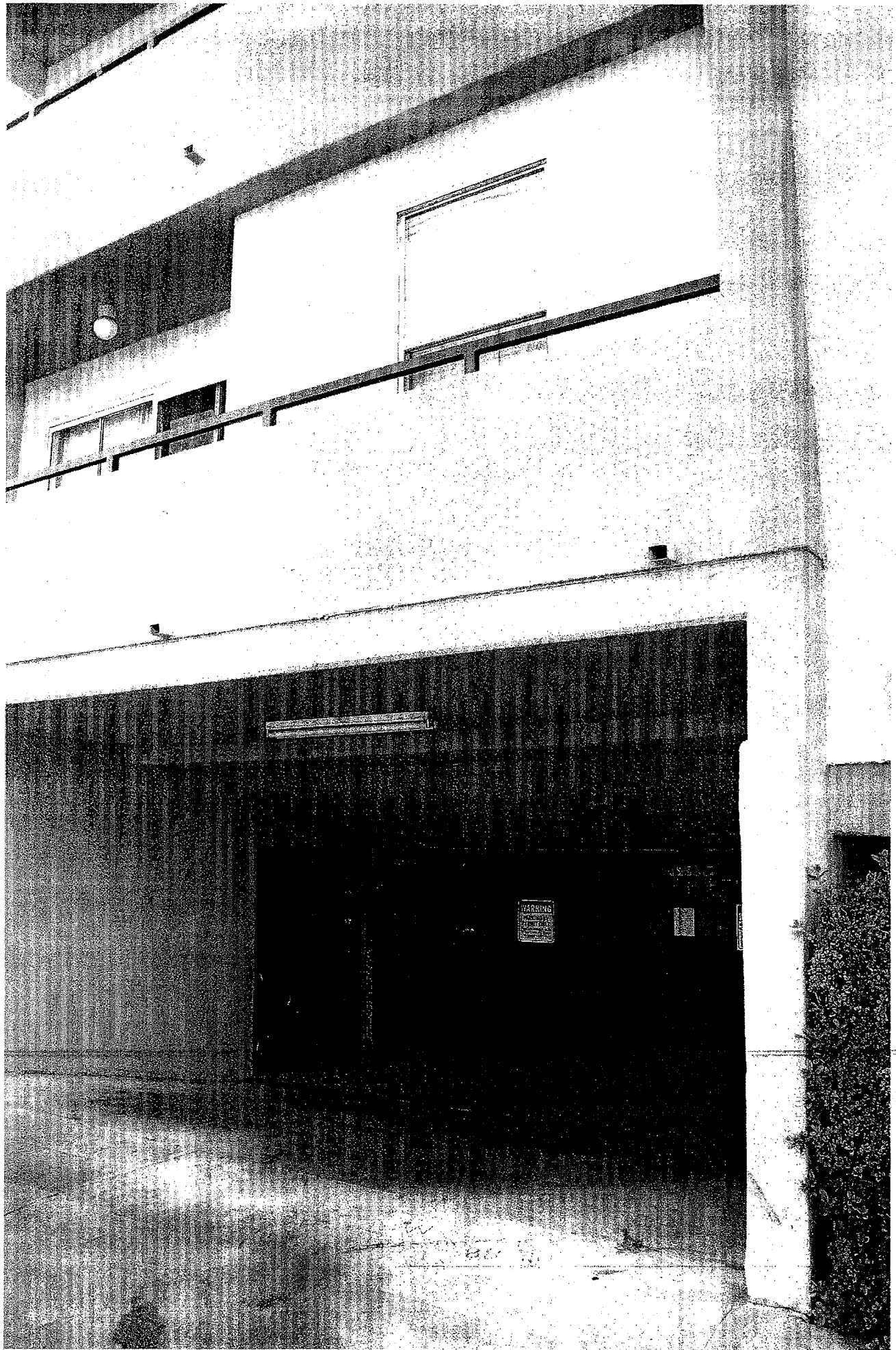


④ Club Marina Apartments Subterranean Entry



⑤ Even this 2 story apartment building is 1/2 subterranean.





⑥ same building as in photo ⑤

⑦ commercial building
at Lucille + Centinela

2 story near
homes



subterranean
parking

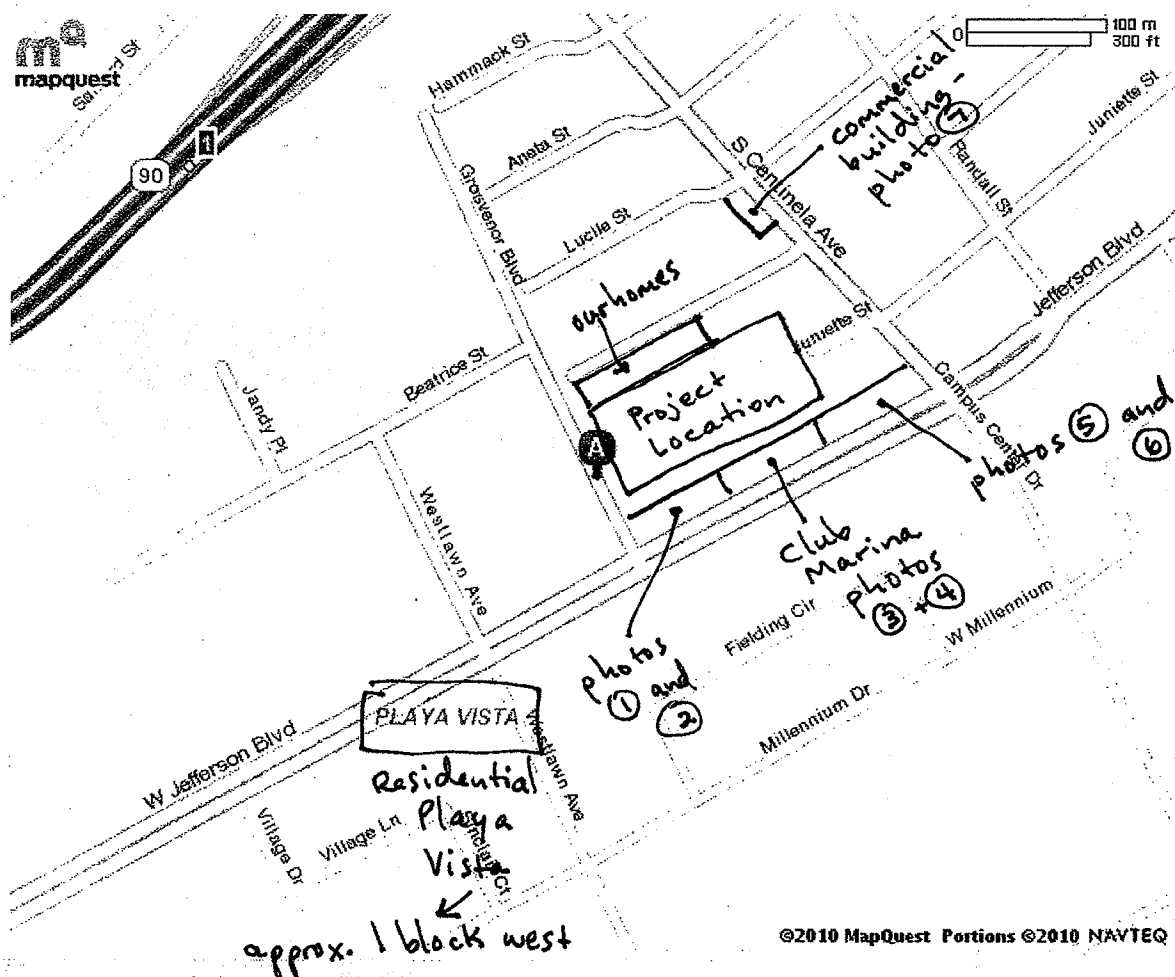


MAPQUEST

Notes

Map of 5550 Grosvenor
Blvd

Los Angeles, CA 90066-
6956



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